



# U. S. Department of the Interior

Bureau of Land Management

Dillon Field Office
1005 Selway Drive
Dillon, MT 59725

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## RMP Digest Report

## Summary of Responses to Focus Questions And RMP Digest Written Comments

Prepared by the Montana Consensus Council and
Madison and Beaverhead Counties for the
Dillon Resource Management Plan

# READERS GUIDE

BLM Dillon Field Office (DFO), assisted by the Montana Consensus Council (MCC), as the DFO's public participation contractor, and Madison and Beaverhead Counties, as NEPA Cooperating Agencies, convened nine public participation workshops to meet the following objectives:

- To further educate the public on the land use planning process and increase participation and understanding of how to provide comment.
- To generate input and advice for alternative development.
- To increase stakeholder confidence in the Dillon Field Office, the planning process and the RMP.

The Workshops were held in February 2003 in the following communities:

Butte – February 4
Dillon – February 6
Ennis – February 11
Jackson – February 12
Lima – February 13
Bozeman – February 19
Twin Bridges – February 25
Missoula – February 26
Harrison – February 27

Beaverhead and Madison County Commissioners and staff hosted and facilitated six workshops in their respective Counties and the Montana Consensus Council facilitated workshops in Butte, Bozeman and Missoula.

In preparation for the workshops, the Dillon Field Office produced the "RMP Digest" which contained the following information:

- Draft of Chapter 1 of the Draft Environmental Information Statement (DEIS)
- Draft of Chapter 3 of the DEIS
- No Action/Current Management Alternative from Chapter 2 of DEIS
- Appendices and maps providing data and background information

The BLM Dillon Field Office Resource Management Plan (RMP) Draft Environmental Impact Statement (DEIS) will be released in 2004.

Focus questions were developed by the RMP Interdisciplinary Team (ID Team) and provided the format for generating input and advice for alternative development.

The following describes the workshop format: After brief introductions, there was a PowerPoint presentation that outlined the background and format of the workshops. The workshop participants broke for a light dinner and an opportunity to interact and review the draft travel management maps. The group reconvened into two small groups in order to increase opportunities for participation in responding to the focus questions.

County and Consensus Council staff prepared this report by compiling and summarizing the responses to the focus questions from the workshops and comments received by mail or email. The source documents

are available for public review at the BLM Dillon Field Office and with this reference, are included as part of this report.

As with any analysis, there are limitations the reader should be consider when using this report:

- Context – Many of the written statements included additional information provided to better explain, present or support the writer's main point. It is possible the compilation and summarization of these comments may have resulted in the loss of some of this context.
- Trade offs and relationships – Some comments gave a general rule, exceptions to that rule and then explained from the writer's perspective, the logic and importance of the comment. The process of compilation and summarization may have resulted in the loss of some of the writer's logic and reasoning.
- Categorization – The comments were sorted into broad categories to better allow the reader to concentrate on topics of interest. The sorting of rocks provides a good example of the possible issues.
    - Relativism – Determining if a rock is Small, Medium or Large depends on the both the person sorting and the rocks being sorted. Another person or a different batch of rocks may result in a different values being selected.
    - Characterization – While a sort screen of Small, Medium and Large might be used, an equally valid methodology might be to Flat, Round and Jagged.

These limitations were especially apparent in the compilation of the tools and acceptable tradeoffs. What one individual might view as a tool or solution to a problem, might be viewed as a priority, a resource allocation or management emphasis by someone else and another might consider it a consideration in impact analysis.

Because of the limitations inherent in any summary, the Montana Consensus Council and Madison and Beaverhead Counties urge the ID Team members to concentrate on the Responses and Digest Comments sections as starting points by which to familiarize themselves with the publics' actual comments.

The attached document summarizes the responses to the focus questions from the workshops and comments received by mail or email as follows:

- Tools or Proposed Solutions
- Alternative Themes and Ideas
- Responses to Focus Questions
- Management of Released Wilderness Study Areas
- Comments by Page

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# TOOLS, SOLUTIONS & TRADE-OFFS

## *ISSUE #1:How will riparian and upland vegetation be managed to achieve healthy rangelands and provide for livestock grazing and fish and wildlife habitat?*

### Tools or Proposed Solutions

**Riparian Management**

- Willow, cottonwood, and beaver restoration
- Manage by watershed
- Monitor bank stability and aspen and willow regeneration
- Decrease conifer encroachment through prescribed burns and increased grazing.
- Document current condition
- Use habitat typing
- Manage water to maintain riparian areas; i.e. manage uplands to enhance water, for example forest thinning to increase water yield.
- Utilize existing scientific studies
- Employ utilization standards
- There are situations where health of a riparian area can be measured with proper utilization standards. For instance, a residual stubble height or regrowth of 4" may be sufficient to provide for plant vigor, streambank protection, and sediment entrapment. On the other hand, DFWP uses a rest rotation grazing system on DFWS lands to meet their wildlife goals without strict utilization standards and guidelines, Every year one out of 3 pastures is rested, and early season grazing only occurs one of the three years in the rotation.
- Set restoration priorities and goals for healthy acquatic habitat.
- Establish Important Bird Areas (IBA) with help from Audubon.

**Upland Management**

- *Under current management, uplands continue to be under utilized resulting in "stagnation" in perennial vegetation. Current management practices generally provide for 40% upland utilization, which is too conservative. Upland utilization standards should be around 50 percent. A 50% utilization standard by weight on native grass species will sustain the vigor and health of the plant while protecting soil resources. An annual increase in old production on the uplands increase pressure on riparian areas by livestock and wildlife.*
- Decrease conifer encroachment.
- *Manage sagebrush by burning without reducing sage grouse habitat.*
- Recognize benefits of sagebrush for shading soil and collecting snow, small animal and bird habitat.
- Use BLM fence manual.
- Salt in sagebrush as/to create disturbance
- Utilize existing studies.
- Vary sagebrush by grazing treatment
- Monitor use, vegetation, soil types.

**Conifer Encroachment**

- Grazing selectively –grazing also open
- Encourage Christmas tree cutting on smaller trees
- *Conifer encroachment taking water and reducing watershed yield*

    - *(Use) fire in early seral stages (small trees)*
    - *Older – clear cut to historic range*
- *Priorities for prescribed fire:*
    - *Aspen groves*
    - *Brush and conifer encroachments in grasslands*
    - *NOT near Virginia City*
    - *During time of low risk (wildfire)*
- Encourage harvest *(of)* dead wood for firewood
- Mechanical logging/harvest
- *Encroachment = line beyond where commercial logging not feasible*
- *Encroachment offers cover for wildlife*

**Levels of Grazing**

- Assess carrying capacity.
- Restrict access to riparian areas – temporary and permanent fencing.
- Develop water sources away from riparian areas.
- Use rest/rotation.
- Monitor and assess damage from grazing.
- DFO-wide suitability and capability analysis to determine appropriate grazing levels.
- *If necessary, use additional practices such as: taking all vegetation off by grazing of a particular area allowing all plants to have an equal chance to recover during a rest period rather than leaving ½ of the vegetation and having the desirable species complete with vigorous undesirable species. Or graze a particular area heavily after seed shatter so trampling will reseed grasses then defer for stand establishment.*
- Declines in vegetation including willow volume and woody species in riparian areas during winter and spring months should be monitored, recorded. and accordingly attributed to wildlife rather than livestock. Wildlife numbers in the area should be adjusted accordingly.
- Should be some areas where there is no grazing – Bannock, Reservoir Creek, sage grouse areas, Tendoys (impact of grazing on Big Horn Sheep).
- Salt in sagebrush as/to create disturbance
- Use herds of animals to create disturbances & create new growth grass & sagebrush
    - Vary sage brush by grazing
    - Heavy *(grazing) = (selects for)* more sage
    - Light = less sage
    - Less sage & grouse due to good grazing practices
- Heavier grazing, cattle harvest everything. Everything has equal chance at regrowth
- Lighter grazing – cattle select "better" forage, giving some plants
- Improve ground for grazing – wait until after seed shatter, very intensive*(ly)* graze for short period with soil moisture. Cattle work seed into ground. Don't graze following year
- Rotational grazing to improve health of land
- Control of wildlife populations by hunting uncontrolled grazers
- There is only one: Rest-rotation grazing following the principles and concepts of August L. Hormay. Study "Principles of Rest-rotation Grazing and Multiple-Use Management" USFS training text 4-2200, Sept. 1970, and "Rest-Rotation Grazing – A New Management System for Perennial Bunchgrass Ranges" U.S.D.A. Forest Service Research Report No. 51, Oct. 1961. Rest-rotation grazing manages all vegetation and improves soil conditions.

**Ecological Reference Area Proposal**

- Coordinate with other agencies.
- Spray noxious weeds in reference areas, weeds not in climax, been introduced

- Use systematic exclosures.
- Don't fence reference areas.
- In critical areas throughout the travel plan area.
- Identify reference areas of sufficient size to ensure that natural processes are able to take place, both on the micro and macro scale. Focus on areas that have high levels of intactness and represent each habitat type.
- Adequate long-term biological monitoring to explain and interpret the site. (eg: Sage Creek Rest Rotation Demonstration)
- A decade-by-decade explanation of succession since the last "stand replacing" event.
- A decade-by-decade explanation of the successional process until the next expected "stand replacing" event.

## *ISSUE #2: How will forest and woodland resources be managed for forest health and to manage fuel loads, as well as to provide fish and wildlife habitat and commercial wood products?*

## Tools or Proposed Solutions

**Manage fuel loads**

- Prescribed fire, it is a natural role to promote habitat.
- Factors that influence fire ecology on the forest-rangeland interface:
    - Removal of herbaceous vegetation through grazing;
    - Fire suppression activities;
    - Logging.

  Reference studies available on factors leading to disruption in fire ecology on grazed landscapes.
- *Timber needs to be harvested. Regulations are so bad it hardly pays to harvest but with the cost of putting out fires maybe it would be cheaper.*
- Fire money should be used for biological purposes only.
- Forested lands should not be managed for fuel loads.
- Harvest does not replicate natural fire as it removes the least burnable component of the forest and leaves the most flammable – the fine fuels.
- *Allow natural fires to burn where there is no danger to humans or structures.*
- Active management to prevent dead fuel for fires and pine beetle problem.
- Disturbance and harvest of the resource must be recognized as an important aspect of any management plan.
- Public-land forests are not private-interest tree farms.
- No prescribed sagebrush burning.

**Manage for forest health, commercial harvest, and habitat**

- *Protect watersheds – begin in forests and benefit fish, wildlife, grazing.*
- Monitor grazing allotments and prevent over-grazing.
- Manage beetle infestations.
- Cost effective timber harvesting.
- Identify and map plants identified as weeds and exotic species.
- Clearly articulate the scientific underpinnings behind any problem and solution identification in the final RMP.
- Grazing (done properly) to benefit public land.
- Close, reclaim or obliterate new roads built primarily for timber harvest. No new roads.
- Rest/rotation grazing.
- Preserved old growth for diversity and to protect dependant species.
- Maintain timber on public land for elk security cover.
- Allow for the natural role of insects.
- *Thinning of areas with dense little trees.*
- Include stand survey maps of forested habitats, habitat types and age class structure.
- Manage for multiple-use.
- Logging is not appropriate in riparian areas, areas of concern for wildlife/birds/fish species, steep areas, or archeological, fossil, or recreation areas.
- Stop using the idea that secondary growth timber is encroaching. Many big game winter ranges need more timber cover, e.g. Sawmill Gulch.
- *Controlled prescribed fires to:*

        - *create new growth*
        - *eliminate dry fuels that make fires uncontrollable*
    - Diseased or dying forest areas should be priority
    - Prescribed thinning in forest types where it is needed and useful.
    - Forest management activities not appropriate in WSAs, areas near or adjacent to WSAs, ACEC's roadless areas.
    - *Prioritize treatments in diseased areas of trees*
    - *Merchantable timber could provide some income for the BLM, just like livestock permittee fees.*
    - Forests and woodlands provide snow storage, wildlife habitat, recreation, and local timber products such as post and poles.
- Prescribed bums and increased or intensive livestock grazing are management tools which can be used to effectively reduce fuel loads and conifer encroachment, thus resulting in healthy forest and woodland resources. A correlation may exist between increased livestock grazing controls, and increased conifer encroachment.
- *Forest and woodlands need to be actively managed to prevent dead fuel for fires as well as the pine beetle problem that is starting to show up. Overgrowth in these drought years is totally unacceptable.*
- *Management should include:*
        - *Thinning small ponderosa*
        - *Regenerating aspens*
        - *Controlling noxious weeds*
        - *Erosion protection*
        - *Prescribed burn.*
        - *Develop a plan that allows for natural fires to burn where there is no danger to humans or structures.*
        - *As a part of the RMP process, the DFO should also consider where prescribed burn is appropriate.*
    - Non-management of timber stands in the Centennial Mountains has severely decreased or eliminated forage in small meadows that have disappeared entirely due to encroachment.
    - *We feel removal of herbaceous vegetation by livestock grazing is the most significant factor leading to a disruption in fire ecology on grazed landscapes*

## *ISSUE #3: How will noxious weeds be controlled on public lands, and what conditions will apply to permitted activities?*

### Tools or Proposed Solutions

- Emphasize biological controls.
- Monitor weeds.
- Weed plans for all land disturbance activities.
- Only non-toxic means.
- ORV and snowmobile restrictions and control.
- Integrated pulling, chemicals and prevention.
- Coordination with Idaho for list of "noxious" weeds.
- Inventory and map weeds and introduced grass species.
- Steam cleaning of all wheeled vehicles before entering BLM land, including contractors and BLM vehicles
- *Develop a plan to address the causes of the spread of noxious weeds, including identification of all sources. Source activities must be curtailed, stopped or otherwise addressed in the RMP revision.*
- Volunteer pulling.
- *If biologicals are effective, problem is too big to spray*
- Too much emphasis on placing blame for spreading weeds, it's everyone's problem.
- Permittees could be encouraged to handle small infestations through reimbursements.
- Hay and grain trucks should be covered when crossing BLM land.
- Boot washing sites manned by conservation groups.
- Research by graduate students to come up with biological controls.
- No off-road/trail motorized use.
- *Herbicides that are harmless to native plants and wildlife.*
- Herbicide use should be limited to travel routes and small weed patches. Does not make sense over large acreages because they promote weed growth. They initially kill weeds and other plants, but then the weeds come back and are able to out-complete the other plants.
- Seed native grasses and plants.
- *Weed seed production can be minimized or curtailed by livestock grazing. In riparian areas where grazing has been excluded, Canada thistle appears to be more common. Spread of shrubby cinquefoil appears to occur in areas where upland utilization is limited.*
- Enforcement of the OHV EIS.
- Road corridors are the main areas for noxious weed infestation.
- Require certified weed free forage and materials for rehabilitation, contractors and users.
- *Don't wait until patch big enough to spray*
- *Don't spray everything else, ie: non target species*
- Spraying every third year.
- Handpulling
- Put prisoners to work Put 'em to work
- Offer a bounty for noxious weeds that are brought in.
- No chemical controls along streams.
- Manage the perennial vegetation and it will control annual weeds (rest/rotation grazing).
- Wilderness and wilderness study areas should be managed differently – in a manner appropriate to the character of the area.
- Start chemical controls at the urban vector.
- Don't use land so hard.

- Require contractors to wash their equipment.
- *Coordinate management so weed control is effective – do not create designations that will make fighting weeds harder*
- *We need to expand the discussion to exotic species. We'd like to see a BLM map of the weeds including crested wheat grass, Timothy and Kentucky blue for example*
- We recommend the use of GPS technology to map weed infestations and allow for easy follow up treatments
- Since there are so few known "sensitive" plants, those that may need special protection could easily be protected with pyramid type wire cages—including plants on ridge tops where mineral or supplement is placed. Cages would also provide a good monitoring point.
- *Mandatory complicance w/ MT law*
- *Need to focus on what type of plant (we) do want*
- *I feel that a greater effort needs to be pursued to educate the recreating public as to what noxious weeds are and do to the lands that we love to be a part of. Next to this I feel that chemical control is by far the most effective though more costly way to control the weeds*
- *Where there are roads, spray along roads as that is the easiest and (causes) least damage*
- Sheep, goats and llamas are being used in areas now. Consider using service contracts.
- Aggressive, extreme road grading occurring in allotments that is making perfectly prepared weed beds along the roads that are then ripe for weed infestations, especially given the amount of hunting traffic that some of the roads get in the fall.

## Educational Opportunities

- Coordinate with programs of private groups to promote awareness and clean vehicles, e.g. car washes during hunting season sponsored by sportsmen groups.
- Educate resource managers, ranchers, road maintenance crews, local communities, school children to identify weeds.
- Pamphlets to schools, calendars, word of mouth, posters, ads, signs.
- Get native plant clubs to take on projects.
- Education to the public – how we spread what's noxious, how wildlife & vehicles spread. SHOW them. Demo plots or areas
- Ranchers, road maintenance crews, school children and local communities should receive education and information on how to control noxious weed seed dissemination, how to identify and eliminate same. In NM, the Santa Ana and Sandia pueblos are having major success in removing salt cedar from their lands. Maybe they would share pointers with you. Get native plant clubs to take on projects for you.

## *ISSUE #4: How will the sage grouse and westslope cutthroat trout conservation strategies be applied in the planning area and how will they affect other public land uses?*

## Tools or Proposed Solutions

**Sage Grouse Conservation**

- *Emphasis areas should include Big Sheep Creek and in the Centennials.*
- Evaluate effects of sagebrush spraying, burning, and adjacent land development on critical habitats.
- *Stop destroying sage grouse habitat – limit grazing and burning.*
- Collect information about historic sage grouse habitat and current use areas.
- Identify important habitat components for each of these species, using the best available science, identify necessary management actions and habitat standards that must be implemented in order to achieve recovery of each species.
- Reduce predation.
- Correct grazing manages for grass and less sagebrush & grouse
- Places of grazing are good SG habitat.
- Don't trail cattle through sage grouse habitat during nesting.
- Timing & duration management
- Get out of species responsibility – concentrate on habitat.
- Before application of implementation of any conservation strategy is taken through management practices, the principles of sustained yield, multiple use, and local economic impact must be reviewed.
- Manage to protect and enhance sage grouse.
- *Establish and manage for productive climax vegetation every year in known nesting and brood rearing areas would serve to mitigate the inevitable effects of drought on a regional basis.* See studies by Beck and Mitchell, Hockett, Prellwitz.
- Incorporate Montana's Sage Grouse plan.
- Interagency cooperation.
- *Conservation strategies should be applied where they have the greatest chance of being successful and where they will have the minimum impacts (including mitigation) on other uses. Their implementation should not disproportionately impact any use.*
- *ALL PUBLIC lands with sage grouse and westslope cutthroat trout must be managed to protect and enhance sage grouse and westslope cutthroat trout. Public lands where sage grouse and westslope cutthroat trout have been extirpated, must be rehabilitated so they once again are hospitable to PUBLIC wildlife*.
- Adhere to MOU on sagebrush burning.
- Collect population data. Analysis by range scientists to analyze the habitat use and needs of the current population objectively based on sound range ecology principles.
- Reduce number of roads.
- Bag limit for sage grouse.
- *Wildlife should come first on public lands – above extractive and consumptive uses.*
- Close sage grouse hunting season.
- Use ACECs to protect sensitive and T & E species habitat.
- Young sage grouse need forbs and water and cover to survive – predators play a big role in decline of sage grouse when there is little cover or feed for them. Overgrazing also affects watersheds where westslope cutthroat trout live.

**Westslope Cutthroat Trout Conservation**

- Adopt the WS Cutthroat Plan in the RMP and use the RMP to ensure adherence to the plan wherever they have been identified.
- There may be higher and better uses in some key areas. Make sure that analysis is adequate before allocating areas for sensitive species and precluding the other uses.
- Some of the worst WCT degradation we have witnessed on WCT streams is related to beaver activity, encroachment, and humans.
- *Provide "minimum level of protection" as far as grazing is concerned. However, in areas where WCT are located, a well-planned grazing system should be implemented, preferably 3-pasture rest-rotation to improve forage cover and bank armoring, and decrease sedimentation from runoff (including fire).*
- *On fish: watershed-based planning usually works.*
- Grayling should be added to the list. This will require coordination with FWP since FWP may have to re-introduce it.
- Manage water quality for cutthroat trout.
- *The DFO has a duty to manage the habitat of these species to aid recovery and overall health and distribution of these species.*
- Think BIG: the habitat is large. These fish are basically extinct.
- *Check out creeks that don't have fish, maybe they can be improved to support WC trout.*
- Keep irrigation as it isolates populations
- *Prioritize reintroduction in areas with natural barriers*
- *I feel that if people want to keep the cutthroat trout pure they need to construct barriers to keep other fish from inner breeding.*
- *Netting or shocking better than poisoning. Maybe scientist can come up with better ways*
- I have documented proof of a high concentration of adfluvial "Westslope Cutthroat Trout" inhabiting the Axolotl lakes chain that are in excess of 30 inches and weigh over ten pounds and again would challenge the staff to identify other instances or areas equal to this environment that support a fishery as unique as this one.
- *If concerned (about populations) why are we fishing for WCT*
- Biggest threat to ws cutthroat is other species of fish and drought.
- Manage the upper Beaverhead River drainages for native fish; think bigger than the 84 miles of streams that are under consideration as an ACEC. Also protect grayling habitat.
- *Strategies for westslope cutthroat trout, e.g. maintain water temperature, where the fish are found, make sure stream carries enough water in August and in drought.*
- The hunting and fishing associations and clubs have to help you with this issue.

## *ISSUE #5: What level of commercial or other authorized use should be allowed in the planning area, and what conditions will be applied to permitted activities?*

**Grazing**

- Consider the full ecological and economic costs of livestock grazing and production. Production means not only the "gazing or cropping" of grasses, but the other indirect and direct effects that are associated with livestock production.
- Evaluate the desirability of permit retirement buyout and permanent retirement of grazing allotments being advocated by NPLGC.
- Define rest-rotation grazing.
- Grazing is a necessary and historic use of the land and a very good management tool for grass lands.

**Other commercial uses**

- *No more PRIVATE commercial development of any type in PUBLIC wildlands*
- *Commercial outfitting in WSA's*
- *Avoid ecologically intact areas with ROWs, roads, etc*
- *Do not allow for increases in commercial hunting and fishing on BLM lands.*
- *Understand, and communicate to the public, the cumulative effects of permitted activities on the public's resources, both now and in the foreseeable future. Conduct a cumulative effects analysis so that this information is understood.*
- *Permitted uses need to fit into multiple use process*
- *There should be a place for all of it.*
- *Commercial uses should be allowed when they benefit the infra structure of our society. We need utility lines, roads, various mining ventures, logging, etc. and the freedom for recreation in our public lands.*
- *Commercial use to fullest extent possible in responsible manner*
    - *Fullest use = non-exclusive & multiple use or users*
- *Public lands should be used like they have been for the past 100 years if that is history*
    - *except critical*
- *Has to be used, grazed & logged to reduce fire danger. Provides economic benefit to govt and local economies*
- *To use is also to recreate & look at*
- *Encourage recreation base*
    - *Encourage = be liberal (with) recreation/commercial access*
- *Other commercial uses are necessary, provide year round jobs*
- *Permitted uses need to fit into multiple use process*
- *multiple use – most motorized recreation*
- *Seed collection, except for rare plants seems acceptable as does research and special rec. permits*
- *Permitted uses need to fit into multiple use process*
- On mineral collection the main thing is "right of succession."
- *Accelerate treatment of commercial forest lands – in areas identified in the plan as commercial – to reduce the potential for fire, to reduce bugs and to increase water yield.*
- *Implement any strategy for privatizing or commercializing public resources, e.g. allowing outfitters and guides on the Big Hole and Beaverhead Rivers, permits for non-resident hunters, and managing access, with care so that the public does not feel pushed aside.*

- *Need a certain amount of use in most areas. Gravel pits are important to counties – on BLM land. Pits must be reclaimed.*
- Include recreational use in the analysis of areas with the potential for Timber harvest.
- *Evaluate the potential for wind generated energy and evaluate the visual impacts. Consider birds in wind generating.*
- *Logging is a good management practice for mature timber areas.*
- Activities should only be emphasized in areas where the activities are not harmful to the land and wildlife and where conflicts with other public land users are minimal.
- *Commercial uses should be allowed when they benefit the infra structure of our society. We need utility lines, roads, various mining ventures, logging, etc. and the freedom for recreation in our public lands.*
- Seed collection, except for rare plants seems acceptable as does research and special recreation permits.
- *Lease land for oil and gas – national need for products*.
- *Monitor the outfitters and guides uses of public lands very carefully. They shouldn't replace or interfere with public land users. A written policy should be implemented or enforced.*
- There should be an equitable process for all parties interested in commercial activities. The current process seems skewed to area landowners.
- From personal experience on land I own the impact of utility transmission facilities, communication facilities, road right-of-ways, and oil and gas development, and strongly oppose such development on public land except in case of a clear national emergency and a lack of any other alternative.
- People who manage these areas seem to be ignoring pp. 20-46 of the Interim Management Policy. It has directives about monitoring, cumulative effects, wilderness qualities and solitude. BLM should be using its own existing policy.
- Don't permit motorized rendezvous.
- There should not be any drilling in Big Sheep Creek.
- Recreation use permits for outfitters and guides should not exclude the public from these areas. Extractive uses should not occur in areas of ecological concerns for species and their habitat.
- It is not appropriate to open a section of land to public land to guides and outfitters when it already is leased for livestock grazing. At the very least, the livestock permittee should be notified and given the opportunity to bid on any recreation permit that is being considered.
- Ranchers need to be able to have vehicle access to water tanks and salting areas to help keep their livestock scattered which helps control livestock from collecting in certain areas and causing damage to sensitive areas.

## *ISSUE # 6: Should any areas moving forward as potential Areas of Critical Environmental Concern (ACECs) be designated and what kind of management is needed to protect the values they contain?*

### Tools or Proposed Solutions

- Action to preserve: Beaverhead Rock, Blue Lake, Virginia City Historic District.
- Interpretation for: Block Mountain and Lewis & Clark Trail.
- Warning for Thorium City Site
- The classification of the Axolotl Lakes as an "Area of Critical Environmental Concern" for the rare salamander is far too narrow of focus for these lakes. I request your staff revisit this particular area and revise the RMP to include references and more importantly measures to ensure the long term survival of the fishery.
- Twin Lakes: This drainage contains two lakes at the eastern base of the Continental Divide. The lower lake supports a rare population "ling cod" or "ling fish". The upper lake supports a healthy, thriving population of rare native lake trout as well as "Westslope Cutthroat". They were genetically tested and their natural status established through a study conducted by the federal government in 1998. 1 cannot find mention of this area in the RMP and would request this specific area be reclassified as an "Area of Critical Environmental Concern".
- All of the areas need to be protected as roadless wildlands.
- Reconsider nomination for “Sage Grouse Areas.”
- Non-motorized use is appropriate in these areas of concern:
  - Big Sheep
  - Centennials
  - Centennial Sandhills
  - Centennial Valley Wetlands
  - F.H. nesting area
  - Westslope Cutthroat Trout habitats need to be protected from siltation from logging or extractive use degradation.
- Resource identification should have priority over all over uses.
- Protect those values. These ACECs were nominated. Manage from THERE. Don’t permit activities that run afoul of the values.
- Why didn’t livestock allotments get the same treatment as ACECs?
- There needed to be a focus question on wilderness recommendations too. There needs to be a focus here.
- Interagency and private owner cooperative management on Lewis & Clark Trail.
- These areas should <u>not</u> have logging, mining, oil drilling or additional roads built in them.
- Water tank projects are good to keep livestock scattered. Issue permits for public use of historic, geological and wildlife sensitive areas plus educating the public to the reasons for the restrictions. Stream barricades for cutthroat trout management to keep them pure.
- Virginia City Historic District – If “old trails” are being considered for use in a historic district as rumored the right of the private landowner can’t be emphasized enough! Some “proposed” trails ignore private property.
- Virginia City Historic District – If “old trails” are being considered for use in a historic district as rumored the right of the private landowner can’t be emphasized enough! Some “proposed” trails ignore private property.
- Keep livestock out. Prevent erosion. Severely limit off-road and sand dune vehicles or, better yet, keep them out before it’s too late.
- Beaverhead Rock – compatible uses

    - Big Sheep Creek Basin – no wheel vehicles
    - Block Mountain – compatible uses
    - Blue Lake – no wheel vehicles
    - Centennial Mtns. – other than wilderness do not lock it up. Compatible uses.
    - Centennial Sandhills – No wheel vehicles – leave in natural state.
    - Centennial Valley Wetlands - do not give to FWS – leave in natural state
    - Everson Creek – compatible uses.
    - Ferruginous Hawk Nesting Area - compatible uses.
    - Lewis & Clark Trail – no wheel vehicles.
    - Muddy Creek/BigSheep Creek – no development
    - Thorium City Site – no wheel vehicles
    - Westslope Cutthroat Trout Habitats – MOU dictates management.
- *Commercial use should be minimized, as in a wind farm in a nesting area and logging near a wetland.*
- Specific designations to an area (WSA, ACEC, Wild and Scenic River), have the potential to limit management activities and alternatives. These designations, although supposedly meant to protect an area, actually have the opposite effect by limiting management and limiting the tools available to management.
- Of the fourteen (14) potential ACEC'S, none require "special management". General management practices already in place sufficiently protect these areas.
- I would answer the issue question with an enthusiastic YES, ALL should be designated.
- Management based upon elimination of roads, resource extraction.
- We suggest the B-DNF and BLM manage the public lands within Black Canyon and the north and south forks of Everson Creek as CMAs. We would encourage the FWP to work very closely with the adjacent private land owner (Dragging Y Cattle company) to manage the conservation easement on the downstream sections of these watershed to enhance and protect instream flows, water quantity and quality and fish and wildlife habitat.
- *Part of the reason Sage Creek provides habitat for so many "special" species is because of current management. Rather than change that management, maybe the BLM should actually consider results obtained since application of the rest-rotation strategy, and apply it, or variations thereof, to other areas they manage.*
- The appropriateness of various management activities depends upon the habitat needs of the species for which the ACEC will be set aside. The best available science should be used to make this determination.

# MANAGEMENT FOR SPECIFIC AREAS

**Beaverhead Rock**

- Action to preserve: Beaverhead Rock
- compatible uses
- Withdraw from mineral entry and surface occupancy including energy and communication towers/sites.

**Big Sheep Creek Basin**

- Big Sheep Basin Water Case #3208 in 1937
    - documents change in Big Sheep Basin
    - Testimony of historic conditions & change
    - Way more wetlands now than historic
    - *Note: correct water case is #3808 in Beaverhead County Courthouse*
- Continue upstream irrigation to maintain wetlands and associated sensitive plant species per water case 3808.

- Non-motorized use is appropriate in these areas of concern:
- no wheel vehicles

**Block Mountain**

- Interpretation for:  Block Mountain and Lewis & Clark Trail.
- like to see develop better grazing, ie: fences, waterline  How would ACEC affect this?
- compatible uses
- Monument boundaries with large concrete blocks, like those available at LS ReadyMix
- Provide no-cost permits to geologic field schools.  Permits would include maps to identify boundaries and help avoid conflicts with co-adjacent landowners and help avoid timing conflicts among the various schools.  The permits might also include information to help prevent the spread of noxious weeds

**Blue Lake**

- Action to preserve:  Blue Lake
- manage weeds
- Axolotl Lakes: These unique lakes contain not only the rare Axolotl salamander but also the largest existing adfluvial concentration of attic grayling in the lower 48 states. I have documented proof of a high concentration of attic grayling inhabiting the upper lake in exceeding 18 inches in length and weighting over 3 pounds and would challenge you- field staff to identify an area within the physical boundaries of this management plan where an existing adfluvial artic grayling population even remotely equals the Axolotl community
- The classification of the Axolotl Lakes as an "Area of Critical Environmental Concern" for the rare salamander is far too narrow of focus for these lakes. I request your staff revisit this particular area and revise the RMP to include references and more importantly measures to ensure the long term survival of the fishery.
- VC watershed protection concern
- no wheel vehicles

**Centennial Mountains**

- deal with bug kill
- fir encroachment
- Fire protection/mgmt to stop catastrophic fire
- Same for fish protection
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation.  ACEC designation is not necessary
- Encroachment by trees – halt
- Non-motorized use is appropriate in these areas of concern:
- make water and wildlife the priority over livestock grazing.
- Centennial management in concert with Red Rocks Refuge – a participant commented that grazing is allowed on the Refuge.
- other than wilderness do not lock it up.  Compatible uses.

**Centennial Sandhills**

- Centennial sand hills have been fenced from grazing.  Why now start grazing?
- Protect from human incursion (anything that disturbs nesting grounds)
- encourage OHV use

- Create service contracts that would utilize domestic livestock to prevent the formation of sod and maintain the sand dunes.
- Non-motorized use is appropriate in these areas of concern:
- Centennial management in concert with Red Rocks Refuge – a participant commented that grazing is allowed on the Refuge.
- No wheel vehicles – leave in natural state

**Centennial Valley Wetlands**

- Protect from human incursion (anything that disturbs nesting grounds)
- Non-motorized use is appropriate in these areas of concern:
- Centennial management in concert with Red Rocks Refuge – a participant commented that grazing is allowed on the Refuge.
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation. Continue upstream irrigation to maintain wetlands and associated sensitive plant species. ACEC designation is not necessary
- do not give to FWS – leave in natural state

**Everson Creek**

- Compatible uses.
- maintain current "no entry" status. An ACEC may tend to highlight these resources.

**Ferruginous Hawk Nesting Area**

- Current mgt suffices to protect ferruginous hawk nesting area
- Part of the reason Sage Creek provides habitat for so many "special" species is because of current management. Rather than change that management, maybe the BLM should actually consider results obtained since application of the rest-rotation strategy, and apply it, or variations thereof, to other areas they manage. That can be done with current tools, does not need "special" designation, and is beneficial to a broad spectrum of resources. Perhaps this would be a good opportunity to work with MSU on a new stage of the study using grad students or interns to reestablish photo points, do new inventories, monitor sage grouse, WCT, ferruginous hawks, or whatever was deemed important as data collection***. See other Matador Cattle Co. comments, 3/10/03 – p. 11.***
- Non-motorized use is appropriate in these areas of concern:
- Maintain current management, including Sage Creek Rest Rotation Demonstration area. Monitor sage grouse populations for predation by raptors
- compatible uses

**Lewis & Clark Trail**

- Interpretation for: Lewis & Clark Trail.
- no wheel vehicles.
- The trail as designated does is on highways/county roads. The purpose of the Lewis and Clark Expedition was to ensure the area did not remain unchanged.
- Interagency and private owner cooperative management

**Muddy/Big Sheep Creek**

- Need to continue historic use – it will change
- most have gone in Muddy – time, erosion
- sites destroyed – preserve

- sites in top of muddy –save
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation.
- does change do damage – preserve status quo
- fence off sites?? keep public out
- Continue upstream irrigation to maintain wetlands and associated sensitive plant species. ACEC designation is not necessary
- don't tell
- no development

**Thorium City Site**

- Warning for Thorium City Site
- Prioritize and reclaim but do not designate as ACEC
- no wheel vehicles

**Virginia City Historic District**

- Action to preserve: Virginia City Historic District
- signing of historic district
- Dispose of separate tracts via Re & Public Purposes(Recreation and Public Purposes), to MT Heritage Comm. to enable better mgmt of remaining BLM
- Encroachment
- If "old trails" are being considered for use in a historic district as rumored the right of the private landowner can't be emphasized enough! Some "proposed" trails ignore private property.
- Keep livestock out. Prevent erosion. Severely limit off-road and sand dune vehicles or, better yet, keep them out before it's too late.
- compatible uses

**Westslope Cutthroat Trout Habitats**

- Westslope Cutthroat Trout habitats need to be protected from siltation from logging or extractive use degradation.
- MOU dictates management
- Stream barricades for cutthroat trout management to keep them pure
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation.
- ACEC designation is not necessary because WCT are already protected by ESA
- If WCT are a problem, don't catch them. If Sage grouse are a problem, don't shoot them. Perhaps there is no need to blame livestock destroying their habitat. If they do, why didn't the Buffalo destroy their habitat too. Other wild game step in the creek also.

## *ISSUE #7: Should any eligible rivers be recommended as suitable for inclusion in the National Wild and Scenic Rivers system?*

***Note: Public support is a consideration in determining WSR suitability. These comments have been sorted but not condensed and are the copied directly from the Issue #7 of the Responses section.***

**No to All**

- Outstandingly remarkable values no need to change management
- WSR designation will encourage more use, don't want more people
- Afraid of designation of entire river because of lack of trust in gov't.
- No
- All segments – More potential for doing harm by attracting more people/recr – more other *(segments)* than Madison
- No! Read public comments
- I can't see any advantage with this. I think it is okay now. I think sportsmen should help to control noxious weeds by part of license fee going for this.
- Rivers are not BLM's responsibility that's FWPs. Didn't see any BLM at the recent meetings on the River – WHY? What kind of uncoordinated plan are you working on?
- Of the eligible river segments, again, none appear to be suitable for designation as Wild and Scenic Rivers. Private land ownership in the surrounding area and potential to affect historic and existing rights appear to be the determinative factors limiting the Beaverhead River, Big Hole River, and Big Sheep Creek for designation. In addition, designation as Wild and Scenic does nothing to enhance the value and uses of any of the eligible stream reaches. The ability to manage any of these stream reaches along with the potential administrative costs associated with management appear prohibitive.
- Leave segments as is – most are short segments.

**Yes to All**

- Preserve character of when Lewis & Clark here
- A plus for protecting these rivers – fear of development along banks
- Need to be preserverd – protected against ourselves
- If local MT BLM & people in the County had control over river designation & mgmt, that would be OK.
- Yes. All eligible rivers should be included for protection under the National Wild and Scenic Rivers system.
- All eight rivers or river segments should be added to the Wild & Scenic Rivers System. It is important that some rivers be kept free-flowing.
- Yes – they should be included – wild & scenic rivers must be preserved. There are fewer of them left all the time. Fisheries in many rivers are diminishing. This status helps preserve riparian areas as well.
- All eligible W&S rivers should be recommended as suitable for inclusion in the National Wild and Scenic Rivers system, and the determination on moving forward with eligible
- All the eligible rivers should be recommended for designation. We have far too few protected waterways in Montana, the West, and the nation.

**Mixed Recommendations**

- Please recommend the Gallatin, Yellowstone, Jefferson, **Madison, Beaverhead, Big Hole**, Red Rock, Upper Ruby, West Fork of the Madison, West Boulder and Boulder rivers along with **Big Sheep Creek** for designation by Congress as Wild and Scenic Rivers.
- A sub-group of the RAC came to full consensus on all but three segments that had previously been determined as "eligible", that those segments were not considered "suitable"—the only three segments without consensus were the three segments of the Madison River. The sub-group findings were confirmed by a full-consensus vote of the Western Montana RAC. The only segments that should be considered as the RMP moves forward, are those Madison River segments, and of those, only those that have little if any private land holdings along the river
- We include with this reference the Wild and Scenic River comments previously submitted by Beaverhead County

**Possible Impacts & Considerations**

- More demand & appreciation as population grows
- Designation prohibits building of dams. Designation may draw more people and increase use. Designation made by Congress.
- However, BLM should coordinate with the state to develop the recommendations because the state owns the water.
- I thought the state owns water in Montana. As such, how can BLM recommend inclusion, have congress pass legislation and if the state objects, do such without it being a "taking"?
- May not attract extra use
- Wild and Scenic rivers should be based solely on the factors outlined in Federal law and regulation, and not based on a list that the DFO or other entity has developed to determine whether or not eligible rivers should be included.
- Don't fear designation. People already here & know about it
- Please refer to Beaverhead County's previously submitted WSR comments and made a part of these comments by reference.
- Hard to do management *(with WSR designation)*
- A problem for private landowners with land in these segments. Restrictions! If I had land within a river segement, I would want my land excluded.
- Concern that any designation will mean private lands involved will be "taken" due to pressure for envir. Groups
- WSR designation adds extra layer of complexity
- Big mgmt problem – powerline issue – replacement
- structure replacement? Maintenance?
- Private land issue – incorp
- How does management for WSR affect weed control?

**Big Sheep Creek**

- Big Sheep should not because it is the main thoroughfare thru area. Designation will make road & bridge repair more difficult.
- Big Sheep segment – check
    - impact on irrigation – none
    - no impact on grazing
    - no impact on weed control, etc
    - impact on the road up creek – Big Sheep
    - preserve historic use
    - need water from bottom

    - impact on use of roads, etc.
    - Remove scenic byway
    - less traffic would preserve
    - less use is better for values
- Big Sheep Creek and same sections of the Madison River should be considered – primarily because these areas for the most part aren't surrounded by private property and they have a lot of very unique features.

**Madison River**

- Madison – withdrawal from mineral entry and exchanges along Madison.
- Bear Trap is already in a designated wilderness area. Inclusion in the National Wild and Scenic Rivers system might just bring more people
- Study and discussion of the Madison segments in the Subgroup led me to think that the three segments of the Madison River are all suitable for inclusion in the NWSR system. Each segment had the qualifications for the recommendation it was judged eligible for (whether as scenic, or as wild); the management and land-ownership situation in each case was workable, particularly if BLM would join in co-operative management agreements where private and other public landownership would best be involved; and the designation would not only strengthen the possibility that the funds and personnel (and the attracting of private support and help-activity) would be made available for appropriate management attention, especially including the weed problem in the wilderness segment, but would underline the importance of the river and river-areas in question in the public eye.
- Big Sheep Creek and same sections of the Madison River should be considered – primarily because these areas for the most part aren't surrounded by private property and they have a lot of very unique features.

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**Big Hole River**

- Big Hole – current management adequately protects values
- The Big Hole should be left as is because the Big Hole Watershed Committee is doing an excellent job.

**General Comments:**

- BLM has done a good job of laying out this issue.
- We appreciate the BLM's efforts to simplify and clarify some river issues through a largely map based presentation in the Draft Wild and Scenic River Eligibility Report (BLM 2002(c)).

## Question 2: Are there alternatives other than Wild and Scenic River designation to maintain the outstandingly remarkable values on each eligible river segment? If so, what are they?

**Alternatives to Designation**

- Yes
- Watershed groups
- Local regulations
- Coord w/ fish & game
- Current mgt practices
- Manage for more people.

- Make a deal with landowners (easements) to stop floodplain development and streamside grazing. Create a buffer zone.
- Withdrawal from surface occupancy and mineral entry may be appropriate to consider in further site-specific analysis of these corridors.
- Educate the users of these areas but DO NOT advertise these areas.
- Partner with landowners to protect stretches of river.
- Acquire river segments with land and water conservation funds, TU, DU, and conservation easements.
- The state designates blue ribbon streams.
- Watershed committees are doing a good job and taking in whole river/watersheds.
- River management not BLM's.
- I'm of the belief that outstanding remarkable value is there now because it has not been designated. No change at this time is necessary.
- Call them an ACEC. Then any proposal will assure the identified values are appropriately considered.
- Set up advisory groups for the different river segments because local control seems to work and every river is different. You need to involve recreationists, irrigators, landowners, and fish and wildlife agencies.

**Only Designation**

- If maintaining the outstandingly remarkable values of eligible river segments is the goal, then nothing short of W&S designation will adequately serve to protect those values. Anything less will merely degraded those values.
- There are no alternatives that will do as much to encourage and enable management that will protect and enhance the values in question (let alone other values associated with the landscape in which the river is set but dis-regarded in the eligibility-assessment process). Nor is there any alternative that will do as much to secure funding for management needs and make management attention a priority matter. Designation should raise the priority-level for proper management action.
- No. These rivers deserve protection under the National Wild and Scenic Rivers system. With this designation, they will actually be protected.
- Not that I know of. Designation is important. What else could work?
- This designation has worked well for the clear water rivers of the Ozark Mts. in Missouri.

## *ISSUE #8: How should travel be managed to provide access for recreation, commercial uses, and general enjoyment of the public lands while protecting natural and cultural resources?*

## Tools and Proposed Solutions to Issues

**General Comments**

- *Need to revisit every 3 years because so much changes so fast – wildlife levels, commercial demand, industry changes.*
- Inventory all current roads and assess whether they impair the land.
- Protect areas that currently have no roads from drilling, motorized vehicles, and other uses that will damage them. Address the impacts of increased recreation on wildlife and fish.
- User created routes are created without appropriate public process or environmental review and most certainly are not "built" to standard. Because of this and because illegally created routes as a matter of policy should not be officially incorporated into a route system, these illegal routes should be closed and fully restored. *Additionally, these routes should only be officially designated when compelling circumstances exist. Compelling circumstances should be clearly defined in the DEIS. We recommend that compelling circumstances be limited to:*
  - *The route provides recreational opportunities clearly desired by a wide range of public interests not met through existing designated routes and is shown not to be ecologically damaging, and*
  - *The route will significantly facilitate travel thereby providing significant benefit to the government and the public and is shown not to be ecologically damaging.*
- *We suggest the respective agencies produce a map based draft road report that illustrate the existing situation such as the BLM did for wild and scenic rivers (BLM 2002(c)). Then specific road conflicts, closures, rehabilitation and/or seasonal management can be identified, discussed and debated. A final report which significantly reduces the amount of roads and road conflicts can then be forwarded for inclusion in the respective land use plan draft EIS.*
- The planning team needs to abide by the principles reached by full consensus of the RAC sub-group and confirmed by full consensus of the entire Western Montana RAC. The most important one being that BLM roads without legal access through private lands, should not be shown on public maps.
- There is a road in Muddy Creek area (the person put it on the map) – it's in the Hidden Pasture Wilderness Study area. That road is not appropriate. It's in violation of the Interim Management Policy. Also: this is bighorn sheep and sage grouse habitat.
- The current travel plan does not effectively address the impacts of increased recreation on wildlife and fish.
- Without first considering the basic ecological needs of healthy vibrant populations of the species that set this area apart, the BLM cannot begin travel planning

**OHV EIS**

- The OHV EIS is a document created by the BLM and the Forest Service with public input from many user groups including motorized vehicle groups and wilderness advocates. The final document is a compromise. While this compromise is not perfect, we urge the BLM to sign it. We urge the BLM for Montana to sign on now instead of allowing one county in another state to hold up this document that took the agency years and endless hours to assemble

## Question 1: What areas/roads/trails, if any, should be limited to exclusive uses (i.e., ATV only, motorcycle only, hiking only, horseback only, mountain bike only) or a combination of uses (i.e., ATV, motorcycle, and non-motorized)?

**Non-motorized proposals**

- *Identify critical wildlife winter areas and close to motorized use.*
- ATV's on designated roads and designated routes – never on trails or user created roads. Problem with enforcement.
- Self-policing – if it doesn't work, close route and take privilege away.
- Identify large tracts of BLM lands to designate for non-motorized recreational use.
- Non-motorized only on WSA's throughout the planning area. In others areas where conflicts occur some should be motorized areas and some non-motorized.
- All roadless areas over 5,000 acres should be kept free of roads. Vehicle access contributes to the weed problem. The commercial users should acquire a permit to access logging sites, water tanks and salting areas.
- Continental Divide National Scenic Trail – manage for non-motorized use.
- It has been shown repeatedly that trail grooming that abuts the wilderness boundary often leads to wilderness trespass violations
- There should be no motorized use other than in designated routes in Wilderness Study Areas; old roads should be removed from these areas and the ground rehabilitated.

**Motorized proposals**

- ATV's on designated roads and designated routes – never on trails or user created roads. Problem with enforcement.
- Self-policing – if it doesn't work, close route and take privilege away.
- All routes should be designated for motorized travel – closed unless posted as open.

**General Management Proposals**

- Adopt motorized access route density standards in order to assure that motorized activities are maintained at an acceptable level for the species.
- The BLM must:
  - Identify the wildlife resources on the DFO;
  - Identify the effects that various types of travel have on those species;
  - Identify all trails and the types of access on those trails, and finally;
  - Identify habitat standards that must be put in place to safeguard that habitat, and make sure those habitat measures are reflected on the ground in the RMP.

## Question 2: Are there any areas that should be designated for intensive OHV use, cross-country vehicle travel, and snowmobile use?

- No ATV areas exclusive! BLM should refrain from using them as well.
- Permit snowmobile use on all BLM land except wilderness study areas and wildlife winter ranges.
- On established roads.
- Prefered that there be No place for intensive cross country vehicle travel
- Groom snow trails to Fairmont, etc.

- *Also, the Montana-Dakotas OHV policy needs to be applied. One of the worst culprits of weed spread, is OHV use. Weed seeds spread through cross-country travel (including snowmobile use) often result in severe weed outbreaks in areas that are not often visited by those concerned with weed control, and consequently are not addressed until someone who cares comes along.*
- *Keep 4-wheelers out of creeks. When travel is confined to roads, it's much easier to find and treat weed outbreaks.*
- According to the Digest, 94% of the Dillon RNT area is open either all the time or seasonally to OHVS. I completely disagree with this emphasis. Motorized recreation should be managed as an essentially non-conforming use of public lands, limited to a few, concentrated areas something like motor parks. In other areas, case-by-case and seasonal uses could be allowed for specific reasons without making the areas wide open to motors. For example, permitees and landowners could be allowed to use motor vehicles in specific areas for specific purposes, and in some areas, game retrieval by motorized vehicle could be allowed during part of the hunting season.

- The BLM should work with motorized users to establish "sacrifice areas" on PRIVATE land. PUBLIC land should no longer be abused by intensive motorized invasions.

## Question 3: Are there circumstances when non-motorized travel should be limited to designated routes?

- During hunting season.
- Sensitive wildlife habitat.
- Yes – areas of heavy noxious weed stands.
- Horses should stay out of riparian areas.
- In grizzly bear areas or veg.*(etation)* restoration areas.
- Areas of weed infestation
- Riparian areas
- Upgrade horse trails
- Yes (Bear Trap)
- None that I can think of.
- Yes, when necessary to prevent the spread of noxious weeds, introduced exotics (ie: new zealand mud snails), public safety (ie: avalanches, grizzly bears) and/or pathogen pollution (ie: whirling disease). Additionally, anytime non-motorized uses are not meeting Rangeland Health standards.
- During hunting season or when recreationists need to gain elevation so they can walk downhill to hunt, fish, or whatever.
- Where topsoil can be destroyed.
- Yes – wheel vehicles should stay out of riparian, creeks, etc. BUT so should non-motorized use such as horses.
- In areas of crucial wildlife habitat, non-motorized travel should be limited to designated routes

## Question 4: Are there any areas where snowmobile use is not appropriate? If so, where?

- Areas with unique features, animals, and sensitive species.
- Centennials where there is BLM access – no motorized, no snowmobiles during hunting season especially.

- Sensitive areas/wildlife habitat where air, noise degradation would occur. Ski trails. Dangerous areas.
- But non motorized vehicle does not necessarily scare wildlife, but there should be some quiet areas for hikers
- Anywhere off the main roads!
- In areas with wilderness characteristics that could be affected (roadless or WSAs); or in consideration of adequate numbers, size and location of areas where snowmobiles could displace or overwhelm other uses.
- Centennial Mtns WSA east of Taylor Mtn because it's right up against highly contested Mt Jefferson area.
- Along the Idaho-Montana Border in the Centennial during the hunting season especially, people from Idaho are in violation of the law by chasing elk

## Question 5: Do we need to acquire easements to provide legal public access? If so, where?

- *As many as possible to maintain reasonable access to public lands.*
- Public Land access maps needed that everyone can afford. Take the money out of the lands program.
- Where is there not legal access? Perhaps a little walking required will improve the BLM lands for hunting, picnicking, etc.
- Yes – to all public land. Identification and acquisition by BLM. Without condemnation. Exception: isolated 40/80 acre parcel.
- Legal public access is an extremely important issue, but it does not have to be vehicular access.
- *Public Land access maps needed that everyone can afford. Take the money out of the lands program.*
- Perhaps a little walking required will improve the BLM lands for hunting, picnicking, etc.
- Yes – to all public land. Identification and acquisition by BLM. Without condemnation.
    - Exception: isolated 40/80 acre parcel.

# OTHER ITEMS

## *Proposals and Tools*

### Question 1: Do you see BLM acquiring a property or easement or pursuing a withdrawal that would provide a solution to any of the above issues?

- Trade with state land to consolidate.
- *Get easements and interagency cooperation – property taxes are still paid on easements.*
- I don't see any value to the BLM owning more land.
- Trades OK but there should be no net gain acreage
- Appraise our valuable wildlife habitat. It's our public land not a farm.
- Moratorium needed on the land exchange program.
- Yes. They have done some of this, but really not enough.
- Yes, to buffer critical areas when needed.
- Appraise our valuable wildlife habitat. It's our public land not a farm. Moratorium needed on the land exchange program.

### Question 2: What types of lands do you think BLM should acquire, if any?

- Purchase any in-holdings up for sale or when there is a willing seller.
- Any lands bordering BLM land on creeks and rivers.
- Acquire unique visually, ecologically important areas
- Acquire wildlife corridors.
- Migration routes in Centennial for Yellowstone
- Winter range for ungulates
- Valley lands adjacent to mountains, land contiguous to existing BLM
- To benefit public access – high in wildlife and recreation values. Been doing a good job with acquisitions.
- Working ranches that are for sale.
- *To benefit public access – high in wildlife and recreation values.* Been doing a good job with acquisitions.
- Lands for the many endangered species in the Dillon Field Office.
- None.
- Get easements and interagency cooperation – property taxes are still paid on easements. Federal lands go off tax rolls.
- Don't waste wildlife and recreation money on land exchanges.
- *Only those that would benefit all users of BLM lands. We feel BLM could benefit all of the public much better if they would attempt to consolidate public lands into one block if it is available, especially Forest Service. Isolated, smaller tracts are harder to manage, or utilize for everyone, the leaseholder and BLM public.*
- *T10S R15W NE1/4 Sec. 21 – to facilitate rerouting Continental Divide National Scenic Trail as well as providing additional security for Lewis and Clark historic interests near Lemhi Pass. Also, lands (or right-of-way) adjacent to Continental Divide in Monida Pass areas so as to*

*enable CDNST to be moved off Long Creek Road and facilitate resupply logistics for CDNST distance hikers.*

- The BLM lands along the Beaverhead River and the Oxolotal Lakes area are good examples of what can be done.
- *Riverfront land, as in the last few years along the Beaverhead: access to the rivers is important, and FWP is not the only vehicle that could be helpful for that. Land with historical significance (Lewis and Clark associations, for example).*
- *We especially favor acquiring the four parcels now owned by the State of Montana, which you have identified as being located adjacent to or near your Centennial Mountains Wilderness Study Area.* We encourage you to consider consolidating and acquiring additional State of Montana lands scattered throughout the Centennial Valley.
- Acquire land that will enhance BLM ability to manage land it already owns. It is difficult to imagine that all land acquired by BLM in past 10 years has met that criteria. The unspoken reason for some of it has been to prevent development!
- *Areas with high natural values such as roadless areas, riparian and wetland habitat, habitat for threatened or sensitive species, winter range, migration corridors, and old growth forest. Also important is to maintain the integrity of areas in and adjacent to ACEC'S, WSA's, and bordering Forest Service or other public lands. If lands are disposed of that have high resource value, some way of encouraging conservation easements would be desirable.*

## Question 3: What types of lands do you think BLM should exchange or dispose of, if any?

- Land locked, isolated holdings.
- Purchase land around VC from California Creek development
- Purchase Alder Gulch patented mining claims
- Put larger tract together and get 40 acre and 160 acre out of system.
- If lands are only good for grazing I think they should sell them to livestock producers so that it will increase the counties tax base.
- *Lands that are bordered by private lands should be exchanged for areas that open up use to a larger area that can be used and managed better for all concerned.* We have been on record as wanting to buy or exchange allotment #30428 for a long time.
- Thorium City site.
- Isolated tracts, lands that can be more easily managed by private individuals or public: ie: FS, DFWP, DNRC *(etc.)*
- Isolated tracts
- BLM has a mandate to manage resources on public lands, so any lands that are unmanageable should be exchanged or disposed of as soon as is practical.
- Public lands that are surrounded by private lands and have no
- None.
- Work with the county governments to find a way to make the transition from public to private land fit with county development policies.
- *Parcels that don't border other public lands and not accessible by public rights-of- way.*
- *Work with the county governments to find a way to make the transition from public to private land fit with county development policies.*

## Question 4: After reading Chapters 1 and 3 and reviewing the No Action/Current Management Alternative Table, do you have any comments that you think should be incorporated into those sections?

- Grazing is a significant issue that was omitted.
- The whole assumption that "grazing is fixed" somehow went below the radar. The RAC can take some responsibility for this.
- In the NEPA process BLM has to show economic and social impacts on the county.
- Let's look at what one bighorn sheep brought in for money to the county against grazing.
- We'd like to see a range of alternatives for grazing allotments in the draft.
- The BLM Dillon Field Office employs a Law Enforcement Officer (LEO) to improve enforcement on public lands. At times the DFO's LEO has been reassigned to "higher" priorities and have resulted in less enforcement on public lands or the Counties picking up the slack.. We would suggest that contracting with the Sheriff's Offices of Madison and Beaverhead Counties would improve response times, and better ensure year around enforcement.
- We're concerned that we are stuck with little roadless areas. Show us the roads, map them, let us give some input.
- If stable wetlands in the Lima and Ruby reservoirs are important, we would suggest the DFO construct small, contoured, terrace like dams to hold water as the reservoirs are drawn down. Coordination and collaboration with the other agencies and users/managers of these facilities would be required for the Dillon Field Office to implement these changes
- Ecosystem management is a daunting task. As each component of an ecosystem is integral to its function means that all parts of the ecosystem including species like micro flora and micro fauna, will receive equal consideration when developing desired future conditions, alternatives, objectives, standards and evaluating and mitigating impacts. Ecosystem management would include all species, including humans.
- There should be much better coordination between the Forest Service, Beaverhead-Deerlodge, the BLM and the State to reduce confusion and wasted effort on the part of the public and the agencies themselves.
- We'd like to make sure that the management alternatives don't just redistribute the problems. The idea of using retired allotments and rest rotation schemes has limited value here because it's so arid.
- Show us an allotment map, identify where conflicts exist.
- Let's see an economic study of the true costs of grazing. What public value we are really getting.
- Your "book" does not discuss the High Tensile 'death fences' – U.I.A. 1885, BLM Fence Manual 1741 – (Red Rim case in Wyoming) Wyoming fence guidelines. Death fences – Robb Redford, Roe Allotment, No. Fk Greenhorn, Wilbur Creek, etc.
- *We must remember that we are currently in a drought era and decisions must take that in consideration so that we don't write rules in stone that will be affected by greater moisture in some years down the line. (Flexibility)*
- The no action is not all that bad. I know RMP's must be updated, but much of what is wrong now is the extremism of how the plan is used.

## Question 5: What did you think of the format, time and location of the public meetings? How could we improve the workshops? (Comments on the opportunity to submit written comments are also included)

**Food**

- Let more people know about food *(bold light dinner will be served statement in press release/posters)*
- Food was good
- Liked to be fed at early meeting
- Don't need dinner
- I think the 1/2 hr. dinner time was a waste of time

**Digest Format**

- More graphics and photographs in Digest
- Please, keep it simple. Compare USFS (2002(a)) Draft Analysis of the Management Situation (AMS) for the B-DNF with the BLM's RMP Digest: Description of the Existing Condition and Analysis of the Management Situation (BLM 2002(a)). )). We found the USFS draft AMS much more user friendly and informative.
- Include the name, phone number and email of the specialist under the section headings they wrote. This would help to personalize the document and allow for easier public interactions with the specialists.
- In hindsight, inclusion of the conservation strategies as appendices to the RMPD or making them available online would have allowed stakeholders to become familiar the specifics of these strategies and better answer these questions.
- History of Grazing Act, and other mandates
- Don't see much chance to change grazing policy – not addressed in Digest

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**Meeting Agenda**

- Like public meeting early to stimulate reading & thought
- Publicize questions ahead of time
- Most of us came with one issue in mind to provide input about
- Hard to address so many issues.
- Too long – I had to leave early
- Good time – early enough not to be too late at end of meeting
- Liked question format & small facilitated groups
- Identify more specifically agenda, so people would know when actual commenting would start separate from introductions
- Have reference material available or synopsis of other materials available that people could review later if they wanted
- Open houses where we have direct access to BLM specialists: most appreciated.
- We had to travel to get to those open houses.
- MCC may have helped get the word out and brought some benefits that way, but we were concerned that this was one more screen in the way of us communicating directly with BLM.
- Should get information out earlier.
- The process including these RMP meetings provide a good opportunity for the public to be involved.
- Public lands are valuable, and we (the public) need to devote time to give input. Anyone can participate who wants to by writing comments or attending meetings.
- Use public radio
- People should be allowed to attend only one workshop. The same person giving the same ideas at several workshops could skew the facts.
- People attending should be required to give their residence and area of expertise, including their educational background.

- Check with Wilderness Alliance and Nature Conservancy for fresh ideas.
- There are some ways to avoid shouting matches at public meetings, if that is one of the objectives you have in mind. The format of the recent meetings, like the one I attended in Bozeman, wouldn't prevent "polarization" (unless, of course, as was the case in Bozeman, there is close to universal agreement on the approach BLM should take among the people who attend). Having non-agency people running the meetings is a good idea. It was also good, I thought, to have small group discussions. On the other hand, not having enough agency people there to answer questions was a big flaw in the approach.
- I would suggest that an unstructured open house, with one-on-one discussions between resource people and visitors, is a good format for scoping..
- I did not attend any meetings. But frankly, I do not think this step in the process was needed at all;
- Let me start, however, with my concerns about this RMP public comment as I have experienced it so far and how I find aspects of that troubling. At the February 6, 2003 public meeting in Dillon, I was disheartened by the conduct of the break-out group that I sat down to join (I arrived at the meeting in progress). Our facilitator, Wally Condon (last name?), seemed to me to project a strong bias towards a ranching perspective and against environmental concerns. Those sitting in that group seemed to share that attitude and I had a clear impression that expressing too much concern for the resource was unwelcome (not explicitly, of course, but implicitly). In fact, as I was coming in, someone leaving told me that the pro-ag bias was a bit hard to take. I also sensed a rush to get through the focus questions as the facilitator needed to get back to concerns at his ranch (it was a cold night and he had a cow that was calving). It seems to me that the BLM should provide more neutral facilitation and try to more actively promote respect for a wider range of opinions
- If a light meal is to be provided, we would recommend **bolding** that sentence in the letter/press release. It was also suggested to include an agenda, so people would know when to show up if all they wanted to do was comment.
- A second and more important concern regards the highly specific nature of the focus questions for the eight defined issues. I believe that questions such as "What natural processes and management activities are appropriate/necessary/acceptable to manage x, y, or z?" can be intimidating to the average citizen who is not trained in the specifics of various resource management techniques. While, on the one hand, I can appreciate the BLM's desire for very specific inputs, this approach discourages more general comments that may not fit well under any of the pre-determined questions. Feeling somewhat daunted myself, I asked the BLM folks at the meeting about making more general comments and was led to believe that if I didn't go into the specific nitty-gritty details about very particular locations, they weren't really that interested in my comments. As a member of the public desiring to offer input on public resources, I found that very disheartening.

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**OK**

- OK - No change
- Thanks for making the effort to come to Harrison. I'm encouraged by the direction I see in your planning process, and I don't feel that too much has been left out.
- I think this system worked very well in the Lima area. Thank you.
- We realize that this interim comment period is unusual, and a huge amount of extra work and time for your office personnel. We sincerely appreciate the fact that the BLM is allowing plenty of opportunity for public input, and hope that the extra time and effort will be more than worthwhile in the long run
- They were very good – good interaction if BLM will just implement our concerns

# ALTERNATIVE THEMES AND IDEAS

## *Are there ideas/themes you might suggest BLM consider in developing alternatives that would avoid polarizing the public?*

**Non-polarization as an Outcome**

- Making the right management decision based on the resource needs by its very nature could be "polarizing" to the public, but that's not the issue. Management of these lands is not a popularity contest, and the BLM should not be held to some ethereal standard of whether or not their alternatives make everyone happy.
- The public that is interested in the details of land management is polarized; therefore, there is no way to "avoid polarizing the public" when you do a plan, unless you don't make any real decisions in the plan. Please don't do that; it's no way to do land management.
- Avoidance of polarizing public should not be the goal – what is best for the resource is what is important.

**Suggested Techniques**

- Use best available science and regulations – may alleviate some polarization.

## Themes/Alternatives

**Range of Alternatives**

- Make sure the alternatives encompass a RANGE of alternatives that has "nothing below the radar." What that means is that alternatives should be explicitly fair – avoiding the "tendency to weight alternatives toward traditional uses" or show preference -- "skew" was the word the speaker used -- for area landowners, rather than others, interested in commercial activities on BLM land.
- We'd like to make sure that the management alternatives don't just redistribute the problems. The idea of using retired allotments and rest rotation schemes has limited value here because it's so arid.

**No Action**

- The no action is not all that bad. I know RMP's must be updated, but much of what is wrong now is the extremism of how the plan is used.

**Commercial Uses**

- No commercial wood development on public land.
- No more PRIVATE commercial development of any type in PUBLIC wildlands.
- In general, any commercial uses should be secondary-- indeed, tertiary-- and always subject to conditions imposed by the primary aim of management (healthy land and land components) as well as by the secondary aim (non-destructive and non-exploitative human uses which have no commercial element).
- In the conflict between commercial uses and non-commercial (even the same sort of use, as in hunting), the money-makers should take a back seat, even though they say they should be in the driver's seat-- for after all, look at the benefits to the local economy etc. If we try to do that, there is no end to the demands that will be made in the name of local economic need upon land that belongs to all Americans and is to be managed for all, not just or mainly for locals!

- Commercial harvest should be limited to very small-volume sales for locally processed and consumed forest products only. Otherwise, harvest should be limited to domestic and farm and ranch uses like firewood, posts and poles, and house logs.

**Grazing**

- We'd like to see a range of alternatives for grazing allotments in the draft
- Domestic sheep are grazing in bighorn sheep habitat. Similar situations occur between bison and cattle. There is an opportunity here to embrace a whole new vision. Bison migration should equal where elk migrate.
- Don't assume grazing is a natural use.
- There could be a lottery for grazing. Idaho used that idea with some success

**Area Emphasis & Resource Allocations**

- Wildlife habitat considerations first especially in Gravellies, Continental Divide in the Centennials, Blacktails, Beaverhead Mtns. (Lemhi Pass) .
- Centennial Mountains – make water and wildlife the priority over livestock grazing
- ALL public lands within the study area should be closed to cross-country snowmobile use.

**Ecological Values**

- BLM needs to fundamentally shift its priorities. The current mode is outdated. Priorities should be managing on a watershed basis for water quality and wildlife.
- Wildlife should come first on public lands – above extractive and consumptive uses. Harm to wildlife should always be mitigated in some way to prevent continued loss of habitat.
- Manage for land first, people second.
- Manage by watershed.
- We don't need anymore wolves or grizzly bear or lions.
- All public wildlands need to be identified as crucial components of the Yellowstone to Yukon wildlife corridor.
- Grazing not needed to manage ground.
- Priorities that all should agree to: clean water, healthy soil and vegetation, stream bank protection.
- Use of forest-health as a rationale for forest-management actions not attentive to or knowledgeable about long-term forest health but steered by human-benefit motives.
- Ecosystem restoration.
- Recreation top priority
- BLM is a federal agency with a mandate to manage public lands which are owned by all Americans, but in this case, public lands located in southwest Montana. In keeping with the multiple use policy guiding such management, the overall vision that is to guide the current planning process involves several things. To my mind, that policy and the vision-statement for this planning process (see section 1.9 of the RMP Digest) mean:
    - BLM management is, first and foremost, to manage the lands for values intrinsically related to the lands themselves (healthy vegetation and stream systems, suitable habitat for wildlife and fish, land conditions and land-forms shaped by natural processes, or as the vision-statement puts it in regard to the life-systems on the land: "sustain and where necessary restore the health and diversity of forest, rangeland, aquatic, and riparian ecosystems");
    - Within the limits of that primary responsibility, and within the capability of the lands, BLM management is to be directed (as its secondary responsibility) toward
    - Allowing (but monitoring, and where necessary, controlling) human uses of the land which are in principle compatible with the first aim (recreational, educational, spiritual,

and so on) and (in some cases) which can also contribute to the achieving of the first aim while achieving other aims as well, and
    - Overall, overseeing and controlling the multiple permitted uses so as to maximize their compatibility with the health of the land and landscape as well as to minimize or eliminate their conflict with each other.
    - Then such management is (on a type by type, case by case, basis, and as its tertiary responsibility) to permit and monitor uses which serve private aims and do not substantially degrade or undermine the ecosystems and the landscape for whose values it is its primary responsibility to manage.
    - Finally, where there are federal laws addressed to public land without regard for the above enumerated mandates but suited to achieving other public ends, BLM management is required to allow actions on the land which are dictated by such laws, even when they violate its primary, secondary, and tertiary responsibilities.
- One alternative should protect all existing wildlands and enhance fisheries and water quality.
- One theme that should be represented in the alternatives is protecting intact ecological values and restoring damaged habitat. This theme would NOT begin with the assumption of continued domestic grazing everywhere and then proceed to mitigation of the worst impacts, but INSTEAD start from the assumption of the primacy of ecological values, and then after careful analysis, allow commodity extraction where the natural systems can take it.
- These public lands need to be sustainably managed and protected for future generations as well. Not just for a decade or two, gradually deteriorating, but in perpetuity. I am deeply disturbed by the attitude that these lands can be treated as "almost private" lands belonging to ranching, mining, or timber interests. I recognize that there is certainly room for such activities on public land, but that those activities are subject to conditions and limitations (such as not causing significant or irreparable damage to the resource). Impairment continues nevertheless and is almost taken for granted. Furthermore, it seems appropriate that industry pays for itself. In other words, my tax dollars should not have to subsidize the gains of private industry from public lands, nor should the public have to pay for the mitigation of damages caused by industry. There is another aspect of the BLM's process that concerns me in this regard. The set of focus questions can excessively narrow what is considered relevant subject matter. "Would you like Pepsi or Coke?" "I'll have water." "No, Pepsi or Coke?" The framing of the question itself predetermines the range of possible answers. What valid interests or concerns are simultaneously overlooked when we select out the examples of westslope cutthroat or sage grouse, for instance, as in issue #4? By not addressing grayling, bald eagles, whooping cranes, or a host of other species, do we inadvertently neglect their habitats? "Focusing" can certainly be a useful exercise, but it needs to be complemented by "gaining perspective" which includes a vision of the whole and all of the various elements within it.
- We encourage both the BLM and USFS to shift management emphasis from development and production (timber harvest, grazing AUMs, road building and mining) to habitat restoration and protection (soil, water, plants and air), fish and wildlife conservation, and restoration and tolerance of natural processes (flood, fire, drought, insects, severe winter and native herbivory).
- Manage for public wildlife, with a particular emphasis on management for threatened and endangered species or secluded species that depend on solitude, such as elk, mountain goat, wolverine, fisher, martin, and lynx.

**Other**

- Cooperative Management where the BLM DFO staff would conduct ecological/biological evaluation and monitoring to monitor and evaluate ecological, biological conditions and trends as well as compliance with the cooperative management agreement. Day-to-day operations would be managed under a cooperative stewardship agreement.

- The BLM should work with motorized users to establish "sacrifice areas" on PRIVATE land. PUBLIC land should no longer be abused by intensive motorized invasions
- Motorized recreation should be managed as an essentially non-conforming use of public lands, limited to a few, concentrated areas something like motor parks. In other areas, case-by-case and seasonal uses could be allowed for specific reasons without making the areas wide open to motors. For example, permitees and landowners could be allowed to use motor vehicles in specific areas for specific purposes, and in some areas, game retrieval by motorized vehicle could be allowed during part of the hunting season.
- Contract Management where the daily operations of the DFO would be contracted out to either a single contractor/concessionaire or to some consortium, either public or private. The BLM DFO staff would conduct ecological/biological evaluation and monitoring to monitor and evaluate ecological, biological conditions and trends as well as contract compliance. If a single contractor did not want the contract, a diverse consortium might be assembled from:
    - Other federal, state and local government agencies
    - Private, for profit contractors/concessionaires
    - Non-profit groups and foundations
    - It should be noted that non-profit groups like Audubon and the Nature Conservancy have considerable land and resource management experience and may be interested in this opportunity.
- The management of federally owned lands has two primary responsibilities. The first is to do no harm to the lands and to the people of our country, and the second is to be of benefit to people under what has been termed "multiple use." Pollution to land, water and air is documented to be harmful to people near and far. (See Journal of the American Medical Association JAMA Vol 287, No. 9, March 6, 2002.)
- The best possible way to manage BLM resources in this field office is to work in partnership with local jurisdictions, ranchers, and communities in order to best preserve the open space and un-fragmented landscape currently present.
- Adaptive Management – Instead of creating several alternatives based on either more or less management, one alternative would incorporate three levels of management with a range of permissive-moderate-restrictive. The adaptive management alternative would also have criteria to determine when, where and how these management levels would be implemented on a site-specific basis.
    - Resources
        - Restrictive – more protective
        - Moderate – normal/preferred/expected operation
        - Permissive – less protective
    - Resource Uses
        - Restrictive – less output/use
        - Moderate – normal/preferred/expected use
        - Permissive – additional output/use
            - The condition, trend, demand, conflicts, etc, of the site specific analysis (project, watershed, landscape) would direct the analysis to the appropriate level of management. This would allow the agency to have the full range of management actions available in every circumstance and would allow the management to be specific to each sites condition, trend and demand. It would allow stakeholders and customers to better understand and predict agency actions. The management levels would be specific to the site. Adaptive Management also allows for a combination of management options that is not achievable simply by varying management levels.

    - High use levels with more/moderate/less protective constraints/mitigation
    - Moderate use levels with more/ moderate/less protective constraints/mitigation
    - Lower use level with more/ moderate/less protective constraints.
- The Montana Department of Fish Wildlife and Parks is currently utilizing a similar system for big game management. Based on monitoring, the adaptive management plan automatically makes adjustments to maintain the wildlife resource inside their desired ranges.
- A broad array of alternatives could be developed by varying the Desired Future Condition (DFC) target ranges and/or resource allocations/prioritizations that will be made by the RMP.

# RESPONSES TO FOCUS QUESTIONS

## *ISSUE #1: How will riparian and upland vegetation be managed to achieve healthy rangelands and provide for livestock grazing and fish and wildlife habitat?*

### Question 1: What natural processes and management activities are appropriate/necessary/acceptable to manage riparian and upland vegetation?

**Riparian**

- Coordinate the RMP with the Beaverhead NF's riparian amendment.
- RMP should require communication and coordination with FWP regarding riparian and upland management.
- Manage water to maintain riparian areas; i.e. manage uplands to enhance water, for example forest thinning to increase water yield.
- BLM does a pretty good job of managing for riparian areas.
- Beavers should be returned to streams
    - priority with steep banks
    - introduce (plant) aspen, willow in riparian w/o *(not having)* asp/willow to give beavers a start
- Maintain riparians & meanders by:
    - Spring development
    - Salt & mineral away from riparians
- Need for riparian veg & grazing practices to be coordinated. Management practices key – <u>time & duration.</u>
- Be aware, all animals will cross steam at same spot. Sometimes better to let them cross there, put down some gravel.
- Prevent or control erosion.
- Fencing for riparian areas is needed.
- Pipe water away from springs.
- Allow cows to move up out of riparians on their own.
- Balance management activities to benefit fish and be economically feasible for livestock grazing
- Manage riparian areas for wildlife and water quality. Beaverhead is so arid. Riparian areas take on an even more critical role.
- Grazing rotation and stream bank (riparian) protection, available moisture, and drought conditions need to be addressed in grazing allotments.
- Beaver restoration has been shown as a keystone species. The Forest Service has identified beaver as a major riparian species.
- The plan should set specific restoration priorities and establish goals for miles of stream restored and acres improved from poor to good vegetation condition. In the next RMP publication, BLM should include documentation of riparian and upland vegetation condition, as you've done for stream and wetland condition in the Digest. Start a program to reestablish aspen and cottonwood and restore beavers to suitable habitat.
- Two pertinent scientific papers from a recent published study carried out in the Centennial Valley on a FS allotment (1990 – 1994): *"Monitoring Streambank Stability: Grazing Impacts or Stream Variability?"*, and *"Historical Trends in Willow Cover Along Streams in a Southwestern*

*Montana Cattle Allotment"* which support rest-rotation grazing. This study played a large part in the settlement of the Beaverhead Forest lawsuit, and we are curious as to why this locally researched and published scientific study was not referenced during the planning stages of this RMP? We also have a complete inventory of monitoring slides taken over the duration of the study documenting several riparian as well as upland sites. The largest impacts occurred during the 35 months the allotment was rested, and were a direct result of natural events. Other remarks are incorporated into previous sections.

- According to the digest, only 18% of the streams in the planning area are functional. This situation is shocking. It is not sustainable. BLM managers and the pubic must act to change this situation in the short-term; we cannot wait twenty years. Progress must be monitored.
- Engage in restoration activities such as planting willows and re-introducing beaver to improve riparian habitat. ie: sediment control & bank stability
- This is going to be an impossible area since this is the only source of water for elk and cattle.
- Keep livestock away from natural waterways. Initiate erosion controls. Water quality would greatly benefit from these 2 changes.
- It takes water to have a riparian area. Mgt. Activities can help increase water yields. Remove (not clearcut) some forested canopies to reduce transpiration and interception, thus increasing the snowpack.
- Constant monitoring by BLM. Some water developments could pull cattle away from riparian areas. Also, temporary electric fencing works and its fairly inexpensive. If agency doesn't monitor, especially in hot dry weather conditions along riparian areas they will deteriorate rapidly.
- Natural processes to focus on include: unimpeded wildlife migrations, riparian and streambank conditions which lead to healthy, abundant and well-distributed fisheries, native fish and important non-native populations, as well as other riparian-dependant aquatic and terrestrial species, restoration of natural fire, assuring protection of other aquatic resources that occur around seeps, springs, ponds and wetlands.
- Improved riparian conditions have occurred under current management practices. Monitoring should continue as improved conditions are expected to continue. In addition, objective visual inspection of willow and aspen re-sprouting and bank stability indicate improving trends in riparian areas.
- Declines in vegetation including willow volume and woody species in riparian areas during winter and spring months should be monitored, recorded, and accordingly attributed to wildlife rather than livestock. Wildlife numbers in the area should be adjusted accordingly.
- There are situations where health of a riparian area can be measured with proper utilization standards. For instance, a residual stubble height or regrowth of 4" may be sufficient to provide for plant vigor, streambank protection, and sediment entrapment. On the other hand, DFWP uses a rest rotation grazing system on DFWS lands to meet their wildlife goals without strict utilization standards and guidelines, Every year one out of 3 pastures is rested, and early season grazing only occurs one of the three years in the rotation.
- Support the restoration and functioning of streams as healthy aquatic habitat, and not simply where westslope cutthroat trout habitat is in question.
- Limit grazing along riparian areas, especially where grazing impacts not simply the vegetation but the proper functioning of the streams.
- Rip rap – floods are natural process.
- I feel that there has been too much emphasis put on the riparian management. <u>All things in moderation.</u> The ranchers who have grazed livestock in these areas for perhaps 100 years do not wish to destroy these areas either. They know the value that willows give to their livestock, shade for animals, fish and birds, to help with stream bank erosion, which leads to clean water for their livestock as well as the fish. Ranchers like to fish too!

- Fence out streams in critical habitats.

**Uplands**

- Manage sagebrush and sagebrush burning to promote wildlife habitat.
- Some controlled burns of sagebrush.
- Under current management practices, uplands continue to be under utilized resulting in "stagnation" in perennial vegetation. Current management practices generally provide for 40% upland utilization, which is too conservative. Upland utilization standards should be around 50 percent. A 50% utilization standard by weight on native grass species will sustain the vigor and health of the plant while protecting soil resources. An annual increase in old production on the uplands increases pressure on riparian areas by livestock and wildlife. Increasing livestock grazing numbers overall or implementation of intensive grazing systems would increase the health and productivity of the upland areas resulting in benefits to livestock and fish and wildlife.
- Continue the present rest/rotation grazing lands by livestock permitees. If necessary use additional practices such as: taking all the vegetation off by grazing of a particular area allowing all plants to have an equal chance to recover during a rest period rather than leaving 1/2 the vegetation and having the desirable species complete with vigorous undesirable species. Or graze a particular area heavily after seed shatter so trampling will reseed grasses then defer for stand establishing.
- Livestock grazing where suitable feed, water, terrain.
- Locate stock water sites in uplands.
- Balance sage grouse habitat protection.
- Salt in sagebrush as/to create disturbance.
- Control of sagebrush on uplands.
- Balance sage grouse vs. grass issue.
- consider sage grouse population cycles.
- consider impact of Idaho habitat changes on sage grouse.
- Tank installation
    - simplify application
    - speed up process
    - install tanks on cost share basis
    - Install tanks near shade
- Vary sagebrush by grazing treatment.
    - Heavy grazing = selects for more sage
    - Light grazing = less sage
- Sage control – uplands
    - Balance – sage grouse vs. grass issue
    - chicken cycle
    - Idaho impact on sage hens
- Burn more sage.
- Burns of brush – often.

**Conifer Encroachment**

- Uplands – encroachment by conifers.
    - Prefer selective logging to prescribed fire.
    - Can protect resource with prescribed fire & mechanical harvest?
    - How many roads do we need to do this?
        - Permanent roads can be detrimental, prefer temporary roads
        - Winter time logging w/o roads
- Broad range of management tools OK, grazing, logging, etc.

- Encroachment – line beyond where commercial logging becomes unfeasible – thin side.
- Trees now where they weren't in the past.
- Diseased or dying forest areas should be priority.
- Could harvest forest to obtain same results as prescribed fires.
- Encourage harvest *(of)* dead wood for firewood.
- Encroachment provides cover for wildlife.
- Control of encroachment depends on what you are managing for.
- Encroachment = line beyond where commercial logging not feasible.
- Encroachment offers cover for wildlife.
- Offer residents/individuals opportunity to selectively thin.
- Timber management.
- Conifer encroachment continues to be a problem which affects riparian areas, uplands, forest and woodland resources. Lack of natural fire occurrence is a contributing factor to conifer encroachment on rangelands. Increased grazing along with prescribed burning would significantly decrease conifer encroachment, increase production of vegetation, increase vegetative health and vigor, as well as increase vegetation palatability for both livestock and wildlife in the upland areas.
- Conifer encroachment is taking water and reducing watershed yield.
    - Use fire to control small trees.
    - Clear cut larger trees to historic range.
    - Encourage Christmas tree cutting of smaller trees.
- Prefer selective logging to prescribed fire.
    - Permanent roads can be detrimental, prefer temporary.
    - Winter time logging without roads.
- Why is conifer encroachment in willows a problem if it is successional?
- Selective logging preferable to clearcuts.
- Lodgepole is difficult to reseed w/o clearcuts. Other conifers are different.
- What is/was old growth timber 100 years ago? Were they little trees? Is old growth just part of a cycle.
- Burn brush – often.
- Priorities for prescribed fire:
    - Aspen groves
    - Brush and conifer encroachments in grasslands
    - NOT near Virginia City
    - During time of low risk (wildfire)
- Conifer encroachment taking water and reducing watershed yield:
    - *(Use)* fire in early seral stages *(small trees)*
    - Older – clear cut to historic range
- Encourage Christmas tree cutting on smaller trees.
- Thinning
- Burning – fires
- Pole permits – thin
- Grazing selectively –grazing also open.
- Logging
- Harvest some timber, not let it burn in wildfire.
- Forestry specialists decide priority of harvest.

**Grazing**

- Concern about AUM's being predetermined in allotment plans.

- Proven methods like rest/rotation grazing is a good practice.
- Grazing (done properly) is a beneficial use of public land.
- The DFO needs to do a suitability and capability analysis on all rangelands to determine which lands are suitable for grazing. It is BLM's job to do that analysis.
- Buffalo did major disturbances, planted seeds and covered them.
    - Too little concentrated disturbance leave bare ground and creates noxious weeds
    - Can do same disturbances with cattle, spread hay, spray weeds, cattle disturb soils & plant seeds
- Sagebrush & grouse – how much is required, what type of cover needed?
- Use herds of animals to create disturbances & create new growth grass & sagebrush
    - Vary sage brush by grazing
    - Heavy *(grazing)* = *(selects for)* more sage
    - Light = less sage
    - Less sage & grouse due to good grazing practices
- Grazing
    - Heavier grazing, cattle harvest everything. Everything has equal chance at regrowth
    - Lighter grazing – cattle select "better" forage, giving some plants
    - This is why intensive grazing works well
- Improve ground for grazing – wait until after seed shatter, very intensive*(ly)* graze for short period with soil moisture. Cattle work seed into ground. Don't graze following year.
- Grazing should be managed to maintain meanders & healthy riparian.
- All need grazing, riparians, uplands, forest, *(for)* seed spread, fertilize, rejuvenation of plants, economic benefits
- Rotational grazing to improve health of land.
- Livestock grazing improved wildlife habitat on Fleecer Mtn. Contact FWP for more information.
- Public desires to see wildlife instead of cows.
- Monitor wildlife impacts on grazing.
- Fencing
    - Mnt (maintenance) issue
    - Type of fence issue
    - Fence location
        - game vs. fence
        - 3 wire vs. 6 wire
- Control of wildlife populations by hunting uncontrolled grazers.
- New grazing standards are not achievable or not economically feasible to implement.
- Tank installation – simplify application - speed up process - cost share.
- Tank location – not only barren ground - place to shade up.
- New concept rip(arian) areas – cows move off on their own - don't monkey w/ cows, they'll move up.
- Must deal w/ public perception – education.
- Public desire for looking at adjacent stuff:
    - no see cows vs. look at wildlife
- Fleecer sample – elk/cows/applic*(able)* to rip*(arian)* areas – when cows go away mgmt *(management)* tool.
- Elk/wildlife split – count wildlife impact on grazing – adjustment
- Hay field – rip*(arian)* sample.
- Feed impact vs grass – good feed.
- Use livestock grazing as a management activity. Vary timing, duration, intensity and class/species of livestock grazing to move toward desired plant communities

- Selective grazing to benefit woody perennials.
- Selective grazing to benefit forbes and grasses.
- Intensive grazing as a stand replacing disturbance.
- Wait until after seed shatter and moisture, possibly spread hay, then intensively graze for short duration so livestock work seed into ground. Defer growing season grazing next year.
- Make changes to livestock management.
- Natural processes should dominate over management (i.e. cattle grazing) in areas of concern for wildlife species like the sage grouse and in riparian areas that have been degraded by overgrazing so that westslope cutthroats are in danger.
- There is only one: Rest-rotation grazing following the principles and concepts of August L. Hormay. Study "Principles of Rest-rotation Grazing and Multiple-Use Management" USFS training text 4-2200, Sept. 1970, and "Rest-Rotation Grazing – A New Management System for Perennial Bunchgrass Ranges" U.S.D.A. Forest Service Research Report No. 51, Oct. 1961. Rest-rotation grazing manages all vegetation and improves soil conditions. Ask FWP for help.
- "Excessive livestock use" on *properly managed* lands is usually isolated, since cattle grazed "long-term" in an area have learned where the crossings are, and most will stand in line to cross there. Those crossings are typically naturally shallow and wide, with gravel/rock bottoms since they don't like silty areas that tend to be narrow and boggy. When no good natural crossing exists, cattle are more than happy to cross on a stable crossing such as a bridge, culvert, or armored crossing, which are items that can be negotiated in an AMP.
- As long as there is periodic disturbance along with periodic rest such as occurs under a rest-rotation grazing system, those species should not need special protection. Our experience in the Long Creek Study (in the Centennial) was that those "sensitive species" plants that were protected by fencing them out, nearly disappeared, while those left in the grazing system maintained
- Balance management activities to benefit fish and economically feasible for livestock grazing hunting uncontrolled grazers (control of wildlife population).
- Grazing – managed grazing.
- Stock water sites in upland areas.
- Livestock grazing as a management activity.
- Livestock grazing.
- *(where)* suitable water, feed, terrain
    - not around springs – *(instead)* pipe water
- Sample of fence off – Big Sheep Creek – grass issue.
- Try to run it consistently -this makes it tougher.

**Impact Analysis**

- Manage for all wildlife, including songbirds.
- Prioritize resources; develop criteria that reflect those priorities and communicate these in the RMP.
- There are priorities all should agree to – clean water, healthy soil and vegetation, protection.
- Watershed protection begins in forests – benefits fish, wildlife, grazing.
- Prevention of overgrazing protects watershed.
- Monitoring of grazing allotments.
- We suggest that all natural processes and management activities are appropriate at this level of planning and should be retained as part of the management "toolkit".
- An adaptive management approach would make these determinations based on site-specific analysis.
- What is history? 100 years ago or 20,000 years ago. What is length of natural cycle?

- Look at the land, understand why conditions are what they are, then look at your tools available to manipulate. Individual case treatment. E.g., trees small in riparian area, why? What's really happening & what can you do about it? Cause & effect.
- Every area is different -- So use site-specific approach.
- Ex. Fencing off riparian areas – you wouldn't need to do this where creek is rocky & stable. But in less stable areas, yes.
- Mosaic landscape is a goal – mixture of open lands, forest, sage.
- Diversity is good.
- Controlled prescribed fires to:
    - create new growth
    - eliminate dry fuels that make fires uncontrollable
- Reason country is like it is, is because of uses. That is why people live here.
- If it has been used hard, why is it so pretty?
- Base decisions on sound science:
- Based on on-the-ground data.
- Compare site specific monitoring.
- Management activity needs to be revised if not effective.
- Monitor everything affecting resources uses.
- Variety of resources (ie: holistic/ecosystem).
- Interaction and cooperation with other agencies.
- Consider- prior mgmt (management) and how it worked – why.
- Look at balanced mgmt *(management)* options.
- Plant inventory – Long term – 100+ years – balance issue.
- Spray out etc. weeds – control.
- New weeds aggressive.
- Local ranchers are the ones who know their allotment area.
- Look at long term effects of vegetation management.
- All areas, riparian, forests, uplands, need grazing to fertilize, spread seeds, rejuvenate plants and provide economic benefits.
- Non-game birds are in sharp decline. Important Bird Areas (IBA) need to be established with Audubon's help in identifying these areas in and around wetlands and upland areas. Manage to ensure sustainability so that these resources can continue to be productive.
- Consider prior management and its effectiveness.
- Spray weeds with Spike.
- Health of watershed above Virginia City.
- Health = produce good quality water.
- Multiple use and downstream uses dependent on water quality.
- Implement standards for rangeland health.
- Monitoring to verify effectiveness of management practices.
- Decisions base on sound science:
    - based on on the ground data
    - compare site specific monitoring
    - management activity needs to be revisited if not effective
    - monitor everything affecting resources
    - uses
    - variety of resources *(ie: holistic/ecosystem)*
        - interaction and coop*(eration)* w*(ith)* other agencies
- We support watershed level, vegetative habitat type and habitat based land use planning that encompasses the seasonal needs of fish and wildlife first.

- Need natural and/or prescribed fire.
- Control of invasives & noxious weeds.
- Pollution
- Recreation management – control some use.
- No management (preservation) not acceptable.
- Health of watershed above VC.
- Health = produce good quality water.
- Multiple uses depend on good quality water.
- Downstream uses dependant on water quality.
- Look at long term effects of vegetation management.
- Implement standards for rangeland health.
- Make areas
    - good tool
    - monitor these
    - map actions
- Look at historic ones –
    - Look at weather, drought, etc.
    - (Deadwood – old ranger station there)
    - its historic difference
- Fire – in areas
- Tree regeneration – Beaver re-intro*(duction)* – sediment control, bank stability
- Balance sage grouse habitat protection
- Recreation – fishing, etc
- Fire break impact
- Recreation – Outfitting
- Economic activity
- Common sense
- Fencing as a management activity.

## Question 2: Are there any areas or conditions where these processes and activities are not appropriate? Why?

- Look at the land, understand why conditions are what they are, then look at your tools available to manipulate. Individual case treatment. E.g., trees small in riparian area, why? What's really happening & what can you do about it? Cause & effect.
- Be aware, all animals will cross stream at same spot. Sometimes better to let them cross there, put down some gravel.
- Prevent or control erosion.
- Some controlled burns of sagebrush.
- Every area is different So use site-specific approach:
    - Ex. Fencing off riparian areas – you wouldn't need to do this where creek is rocky & stable. But in less stable areas, yes.
- Bear Trap Canyon – avoid 4wd and motorcycle use (not compatible with Wilderness area)
    1) Off road vehicle control – enforcement – travel plan implement*(ation)*
    2) Appropriate list (1) in most places
- Endangered species & habitat.
- Steep slopes – (BMPs) Determined by DNRC.

- Only with collaboration & coop*(eration)*.
- No fires without proper control.
- Improved recreation facilities.
- Logging on steep slopes, use BMPs.
- Riparian lands in Beaverhead county have too many cattle in the water and too much irrigation dewatering the streams. There is too much emphasis on pipelines to water cattle.
- Should be some areas where there is no grazing – Bannock, Reservoir Creek, sage grouse areas.
- Centennials re: Grizzly bears and other wide-ranging species.
- Tendoys re: impact of grazing on Big Horn Sheep.
- Blacktails re: connectivity
- Gravelly re: Grizzly bears and wildlife movement.
- Other important wildlife areas: Beaverhead Mountains – Lemhi Pass re: wildlife connectivity; Continental Divide in the Centennial Mountains. Assure wildlife viability before grazing and motorized use.
- Centennials – there is motorized trespass from the south side and snowmobile tread found on Mt. Jefferson.
- BLM should look at native trout streams and consider fencing to exclude riparian areas from livestock grazing.
- Prescribed fire should be used to improve habitat, but because of the reduction of sage grouse habitat, use of fire should not cause further reductions.
- Sage brush management by burning is a good tool to keep it in check as some sagebrush is good for collecting snow and shading the soil in the summer months and providing habitat for all sorts of small birds and animals, which is good for the natural balance. Ranchers like to see wildlife too!
- Yes – Many – (1.) NOT SPECIFIC – no where do you discuss the BLM fence manual 1741. Statement in your own manual on the unlawful enclosures Act of 1885. Your office continues to build "death fences" for Ted Burner – e.j. Roe Allotment, and doesn't enforce the law!! 61" high fences with bottom wires 11-12" off the ground – your own manual stated the bottom wire not lower than 16".
- No.
- Certainly wildlife considerations should come first .
- Only in areas where other resource values are greater than increasing water yield. Water is the most important resource BLM manages!
- Identify physical locations where grazing may or may not be appropriate.
- Conduct a DFO-wide suitability and capability analysis to determine which lands are appropriate for grazing and at what level.
- Identify key fish and wildlife along with assessments regarding the effects of grazing on these resources.
- We suggest that an adaptive management approach will determine this on a site-specific basis and provide for the most compatible levels of use and mitigation.

- Include a map that shows types of allotments, current stocking rates and identifying key resources within allotments. From that suitability and capability analysis, the public can make an honest and scientifically-based effort to suggest areas where these activities may or may not be appropriate.
  - It is lack of management and oversight/monitoring activity that creates problems, letting users (of all sorts) degrade the land without sufficient timely attention from BLM (monitoring and controlling such uses, whether exploitative or recreational or of any other sort).

## Question 3: Should BLM identify ecological reference areas? If so, where and what types?

**Yes**

- Identify and maintain ecological reference areas, with monitoring and evaluation relative to the reference areas part of the management plan.
- Include resource allocations for designated ecological reserves, opportunities for remote recreation but with a land classification that is less than designated Wilderness.
- Greatest species, including plant, diversity
    - *Definition* – habitat for cattle & wildlife, healthiest
- Might need some (small) research areas
- Yes. Reference different mgt. Applications
    - Yes, BLM needs eco-reference areas. The Forest Service should coordinate with BLM on a watershed basis, and, if possible, on an ecological basis – e.g., sage grouse breeding.
- Keep in mind the BLM may find willing, able private landowner partners on this too.
    - The BLM should use systematic exclosures across different land and plant community types.
    - Yes – in critical areas throughout the travel plan area where degradation of natural resources has occurred, and to protect pristine areas, which remain.

**No**

- Large areas would be stupid, would just invite fire
- If we're referring to a fenced off area, I'd say it's not necessary. Anyone with any amount of Range Management experience already knows what the climax vegetation is in specific sites.
- No. Ecological reference areas are incompatible with ecosystem management.
    - Every ecosystem and area is unique, not interchangeable.
    - Ecosystem is not static, but is dynamic, changing and adapting.
    - No single part of the ecosystem is more important than any other part.

**Noxious Weeds**

- Spray noxious weeds in reference areas, weeds not in climax, been introduced.
- Yes, because noxious weeds are not a natural part of the landscape.

**How to Select/Manage**

- Identify reference areas of sufficient size to ensure that natural processes are able to take place, both on the micro and macro scale. These reference areas must include enough protections to ensure that these processes can continue unimpeded. Location should be based on above assessment, 'and should focus on areas that already have high levels of intactness and higher levels species diversity relative to the rest of the DFO. In addition, at least one representative from each habitat type should be included as a reference area.
- If ecological reference areas are to be designated, we would suggest the following as minimum information be compiled to ensure their usefulness:
- Adequate long-term biological monitoring to explain and interpret the site. (eg: Sage Creek Rest Rotation Demonstration)
- A decade-by-decade explanation of succession since the last "stand replacing" event.
- A decade-by-decade explanation of the successional process until the next expected "stand replacing" event.

**Specific Areas**

- Where axolotls live, as a place to monitor amphibians health:
    - Sage creek rest rotation area.
    - Create monitoring/reference areas.
- Create a wide variety of areas – ecology.
- Critical areas – riparian areas.
- Beartrap, other areas where activities are already excluded could be used.
- Uplands
- Between Badger Pass & microwave station.
- Foresty types: spruce, fir, lodgepole.
- Non-used areas
- Wilderness study areas
- Centennial WSA
- Nicolia Creek
- Those in place
    - Critical areas, riparians and uplands.
    - Between Badger Pass and microwave station.
    - Nicolia creek
    - Those in place
    - Centennial WSA
    - WSA
    - All public wildlands need to be identified as crucial components of the Yellowstone to Yukon wildlife corridor.

**Other Comments**

- Sagebrush range – stop burning sagebrush. Also will you burn sage under "Wildland Urban Interface"? Not even mentioned in your book.

## Question 4: What benefits are important to obtain from riparian areas and uplands on public lands in the planning area and where should they come from?

**Important Benefits**

- Fishing
- Purify & hold water in riparian area.
- Aesthetics – make it accessible w/o crossing private ground.
- Public access
- Bird life on both
- Fisheries in riparian areas.
- Stock water
- Storage water for irrigation.
- Grass stabilized streambanks.
- Wildlife (other, beaver, other indicators of good water).
- Special stipulations, re: VC source water protection area.
- Health of watersheds, clean water – riparian areas.
- Uplands are important for grazing.
- Wildlife habitat (both rip*(arians)* and upl*(ands)*):

    - Healthy vegetation
    - Water retention – late *(season)* stream flow
    - Variety of species – age classes of vegetation
- Clean, abundant H2O supply.
- Functioning watershed
- Grazing
- Recreation
- Wood supply
- T&E species
- Water Quality – Riparian standards are needed that are tied to scientific analysis chemical and biological) of water quality, not standards in use by DEQ.
- Water quantity
- Solitude
- Protection of roadless areas.
- We believe all the benefits and uses are important to obtain from riparian areas and rangelands.
- Keeping these lands free from development such as homes and businesses so we can all enjoy nature.
- Natural areas are beneficial in themselves in that they allow for natural processes to predominate over man's management. This is most important for species of concern where habitat loss/degradation has occurred.
- All vegetation is important for wildlife habitat. The focus must be for all vegetation including residual cover (carry-over vegetation from the previous year). Fencing riparian areas is an admission that you don't know how to manage all vegetation!
- Healthy, abundant and well-distributed wildlife populations including key species such as bighorn sheep, sage grouse, weststope cutthroat trout and arctic grayling.
- The grazing portion for the RMP revision must include riparian buffers and standards that fully protect aquatic resources and maintain ecological function.
- Enjoyment of aesthetic and spiritual nurturing by natural places, which is something becoming lost in our society but needs rather to be expanded to counterbalance the stresses and conflicts of our social life, is also of this type.
- Quality fisheries are the highest and best use of public lands.

**Impact Analysis**

- How do you determine what is introduced?
    - Cottonwood?
    - Timothy?
- Remember, some of our rivers are naturally muddy.
- Public & private lands
- Try to avoid stream bank deterioration and maintain meander by developing springs and water systems away from the creek, also place salt and mineral sources away from the creek. Utilize electric fence for short-term management of trouble spots.
- When good grazing systems are maintained, there are a great deal of wildlife benefits, as well as fisheries benefits. Good grazing practices are also beneficial for soils, shrubs, and streambanks. Unfortunately Implement or recognize rest-rotation grazing systems such as those on the Matador Ranch. The status of continuous grazing or deferred grazing seems to be the only methods..
- Many of the statements on this page seem to directly contradict statements made on P. 92, and P. 147 of the RMP Digest, and encourage unnatural manipulation of encroachment for the benefit of wildlife at the expense of other resource conditions. Since *"Riparian habitats receive a*

*disproportionate amount of wildlife use with approximately 75% of all wildlife species utilizing riparian areas for at least some portion of their annual life cycle…" (RMP Digest, P. 90),* it seems irresponsible to increase coniferous habitat at the expense of riparian areas and natural meadows. See previous comments dealing with encroachment.

## *ISSUE #2: How will forest and woodland resources be managed for forest health and to manage fuel loads, as well as to provide fish and wildlife habitat and commercial wood products?*

## Question 1: What natural processes and management activities are appropriate/necessary/acceptable to manage forests and woodlands?

**Prescribed & Natural Fire**

- Controlled prescribed fires to:
    - create new growth
    - eliminate dry fuels that make fires uncontrollable
    - Diseased or dying forest areas should be priority
- Could harvest forest to obtain same results as prescribed fires.
- The way tracts of forest are managed for fire will significantly impact resident and
    - migratory bird populations.
    - Harvest some timber, don't let it burn in wildfire
- Where appropriate, use fire, including prescribed fire, in its natural role to promote habitat.
- There appear to be at least 4 major factors influencing fire ecology on the forest-rangeland interface:
    - Removal of herbaceous vegetation (fine fuels) through domestic livestock grazing;
    - Infestations of noxious annual grasses and perennial exotic forbs;
    - Fire suppression activities;
    - Logging.
    - These factors may work independently or synergistically to create significant disruptions in natural fire regimes, to the point that fire is no longer an important part of a functioning ecosystem but instead a driving force contributing to ecological dysfunction and extirpation of native species, both plant and animal (Wisdom et al. 2002(a&b)).
    - We feel factor number 1 - removal of herbaceous vegetation by livestock grazing is the most significant factor leading to a disruption in fire ecology on grazed landscapes (Arno and Gruell 1986, Gruell et al. 1986, Belsky, and Blumenthal 1997, Peterson, J.G. 1995, Hemstrom et al 2002, Wisdom et al, 2002(a&b)).
- More reliance on fire than cutting.
- Fire as process – managed.
- Logging does not replicate natural fire.

**Forest Health**

- Want a variety of growth stages, including old growth:
    - Avoid road building where possible. Cost of management, noxious weeds, sediment in streams
- We need to manage forest health
- Because this questionnaire uses loaded terms such as 'fuel loading" and 'forest health, " we expect that the DFO will clearly articulate the scientific underpinnings behind any problem and solution identification in the final RMP.
- Thinning of areas with dense little trees.
- Clear cut conifer encroachment in riparian areas like aspen & willows. Conifers also use more water and take it from streams

- Forested lands should not be managed for fuel loads.
- Thinning pole patches – cut out lodgepole to open stands
- Prioritize treatments in diseased areas of trees.
- Healthy trees = healthy streams = healthy fish
- Identify different areas for different management.
- Selective cutting generally preferable.
- Diseased stands removed.
- The Protection Act of September 20, 1922 (16 U.S.C. 59) authorizes the protection and preservation of timber on public lands from fire and bug kill, etc. There has to be a balance. By law, BLM lands are to be managed for multiple use. By attempting to preserve the forests, it will only be a matter of time before they will be harvested in a much less environmentally friendly manner (wildfire) than if the BLM managed them in a way that could benefit all involved—species, habitat, water quality, air quality, economy, recreation, and, neighbors. The fuel load in the Centennial Mountains is like a box of stick matches just waiting to be lit. As neighbors, we feel the BLM needs to be responsible to manage public lands in a way that will not endanger ours, or cost the public millions of dollars trying to put out fires that could have been managed. That also applies to weed control.
- Non-commercial thinning only.
- Manage beetle infestations.
- Diversity of plant species & age class distribution.
- Road building to reduce bug kill
- Sound forest health
- Vegetation management douglas fir.
- Create a diversity of sage and trees – another mosaic.
- Fire and commercial and non-commercial timber harvest.
- You need to leave a few trees every 20 ft. or so and clean up underbrush. Regulations are so bad it hardly pays to harvest but with the cost of putting out fires maybe it would be cheaper.
- Prescribed bums and increased or intensive livestock grazing are management tools which can be used to effectively reduce fuel loads and conifer encroachment, thus resulting in healthy forest and woodland resources. A correlation may exist between increased livestock grazing controls, and increased conifer encroachment.
- Forest and woodlands need to be actively managed to prevent dead fuel for fires as well as the pine beetle problem that is starting to show up. Overgrowth in these drought years is totally unacceptable.
- Management should include:
    - Thinning small ponderosa
    - Regenerating aspens
    - Controlling noxious weeds
    - Erosion protection
    - Develop a plan that allows for natural fires to burn where there is no danger to humans or structures.
    - As a part of the RMP process, the DFO should also consider where prescribed burn is appropriate.
- Include stand survey maps of forested habitats, habitat types and age class structure. These maps are critical for both the DFO and the public to understand the baseline in relation to forested lands within the DFO.

**Forest Products**

- Harvest of conifers doug fir, & LP, should be pursued.
- Harvest at (maximum) sustained yield rate.
- Helpful to local people to get firewood.

- Forestry specialists decide priority of harvest.
- Management should include some level of harvest, appropriate to site potential and appropriate to other uses.
- Timber harvests should be cost effective. Include the costs of roads in the analysis.
- Don't inflate values that may not be realized, e.g. recreation values associated with roads that should be closed.
- Logging does not replicate natural fire.
- Close, reclaim or obliterate new roads that are built primarily for timber harvest
- Timber harvest, selective cutting.
- Remove old dead trees, but not old (live) growth.
- Save certain areas for habitat.
- Beetle kills are appropriate areas for harvest.
- MT is not OR in terms of clearcutting.
- 70-100 year cycle of cutting (estimated).
- Selective logging preferable to clearcuts.
- Lodgepole is difficult to reseed w/o clearcuts. Other conifers are different.
- Use selective harvest to make up for lack of natural disturbance (fire) that would normally selectively thing stands. Simulate fire with selective harvest.
- Clear cuts create unnatural stands of same age when done in non-lodgepole stands
- Clear cuts OK depending on circumstances. Don't need to be large. Clear cuts should not be square but look like natural parks
- Cut to get some good from dying trees. Take some trees to open stand and get sunlight into lower part of stand.
- Small clear cuts – specific mgmt – lodgepole.
- Timber needs to be harvested. This is like a crop except it takes 50 to 100 years before the next crop.
- From a fish and wildlife perspective, we don't see room for timber harvest on this landscape. Maybe on a really limited basis, such as horse-drawn logging in isolated instances, such as happened on Moose Creek.
- I think that mature stands of timber should be harvested by logging as it helps provide much needed building and timber by products and adds to the economy of our great nation.
- Vegetation manipulation (tree harvest).
- Maintain timber on public land for elk security cover!!

**Grazing**

- Monitoring of grazing allotments.
- Prevention of overgrazing protects watershed.
- Grazing (done properly) is a beneficial use of public land.
- Proven methods like rest/rotation grazing is a good practice.
- Should designated ecological reference areas on uplands & riparian areas to show what grazing is or is not doing.
- Grazing as a tool.
- Grazing is not needed to manage ground.
- Levels of grazing need management attention.

**Impact Analysis**

- Recognize the natural role of insects in the system, and should allow for that natural process to take place. Insects are a natural part of any healthy forest system.
- Old growth should be preserved for diversity and to protect species, which depend upon it. Thinning of smaller trees (selective) should occur to prevent fires in areas close to towns and development. Fire is a natural process that should be allowed in areas away from developed areas.

- A management activity: probably not what you are seeking is for supervisors (management) to assure for a balanced approach to activities undertaken. Rid the concept that tree removal is "bad" or at least ignore obvious staff bias (and it does exist!!) Will Tim see this?
- It is impossible to maintain a growing resource in a particular successional state. It takes planning and management to have a resource in various successional stages. Disturbance and harvest of the resource, whether natural or man made, must be recognized as an important aspect of any management plan alternative
- Forest and woodland management should not stress economic benefit-- our public-land forests are not private-interest tree farms to be managed for timber and private profits and the private economy!
- The use of forest-health as a rationale for forest-management actions seems to me often misguided, not really attentive to or knowledgeable about long-term forest health but steered by ulterior human-benefit motives and advanced under a specious notion of forest health (that health means good at producing merchantable timber, for example).
- I generally agree with the existing fire management plan for the RMP as described in the Digest under the No Action Alternative, but again would ask that ecosystem restoration be given a high priority. And, of course, BLM has to ask for enough money to do the job
- We suggest that all natural processes and management activities are appropriate at this level of planning and should be retained as part of the management "toolkit".
- An adaptive management approach would make these determinations based on site-specific analysis.
- Manage forests to protect riparian habitat.
- BLM does a pretty good job of managing for riparian areas.
- There are priorities all should agree to – clean water, healthy soil and vegetation, stream bank protection.
- Watershed protection begins in forests – benefits fish, wildlife, grazing.
- Please list which plants you have identified as weeds, their locations on a map, what the rationale is for considering them weedy and what if any control efforts will be conducted. Please also list any exotic species that are determined not to be weeds, where they are located and why they occur and will continue to or not occur on this landscape.
- Site –specific mgmt
- Sensitivity to different environments.
    - Good examples – Jerry Ohs, Pony (of cutting on private land) John Armstrong.
- Management activities shouldn't all be directed to economic benefit.
- What is nature?
    - Why is conifer encroachment in willows a problem if it is successional
    - What is history?
- All need grazing, riparians, uplands, forest, *(for)* seed spread, fertilize, rejuvenation of plants, economic benefits
- What is/was old growth timber 100 years ago? Were they little trees? Is old growth just part of a cycle?
- Mechanical timber & forest mgt. Practices for the economic benefit of local economy & forest health – applies to other benefits
- Important because it's the upper part of the watershed (forests and woodlands).
- Concerned about fire money being used too much for other purposes. Fire money should be used for biological purposes only.

## Question 2: Are there any areas or conditions where these processes and activities are not appropriate? Why?

**Site or Condition Specific**

- Determine case by case.
- We suggest that an adaptive management approach will determine this on a site-specific basis and provide for the most compatible levels of use and mitigation.
- Apply tool to conditions.
- No
- Yes – where there are not significant stands of merchantable timber – smaller diameter timber should be left for wildlife cover and to maintain soils and watershed values.
- Where there are significant archeological, fossil, or obvious visitation or tourist sites (such as waterfalls).
- Yes. Where an activity will cause unacceptable harm to other resources (unacceptable as used here is being a logical, reasoned, non-biased analysis).
- Steep areas and areas in close proximity of a stream.
- In determining the appropriateness of thinning activities in forested lands, it is critical that the DFO prescribe this activity in forest types where it is needed and useful, and that thinning for structure protection be limited to within 1/4 mile of structures. By basing its decisions in this arena on science, the DFO will avoid future site-specific problems of trying to justify a project that does not comport with science.
- There are numerous areas where certain management activities are inappropriate-- in WSAs, in ACEC areas, and so on.
- In areas of high natural resource value such as roadless areas, areas near or adjacent to WSA's.
- Mechanized management activities are not appropriate in wilderness areas.

**Prescribed & Natural Fire**

- Let natural fires go. No prescribed sagebrush burning.
- Don't burn to increase forage for livestock.
- Homes don't need to be protected – homeowners have insurance and know when they build what hazards are present.
- There may be fuel load situations when fuel load should be managed to reduce catastrophic fire
- Fire control resources should be targeted around homes. Fire's positive role cannot be over-emphasized. Spending millions on suppression is wasteful. Prescribed burns give control – wildfires do not.
- The RMP must assess the appropriateness of mechanical harvest as a replacement for natural fire. It is clear that harvest does not replace fire in the system, as harvest removes the least burnable component of the forest and leaves the most flammable- the fine fuels. It is critical that the RMP does not make the mistake of using mechanical harvest as a proxy for restoration of fire to the landscape.

**Riparians & Wetlands**

- Logging is not appropriate in riparian areas.
- Manage riparian areas, manage springs

**Roads**

- Timber mgmt minimized where big road costs limit return.
- The roads used and built for the harvesting of timber should be closed after the timber is harvested to provide security for wildlife and to control the spread of noxious weeds.

- No new roads – uphold roadless inventory and roadless areas should remain so.
- Roads are the greatest detriment to clear/good water.

**Logging**

- Places where logging would destroy history (e.g. Alder Gulch mining camps).
- Wisconsin Creek not appropriate for logging because of old mining camps, narrow canyon, steep slopes.
- Outside of DNRC's BMPs for forest mgt
- Logging should not be allowed in roadless areas over 5,000 acres.
- Logging should never be allowed in areas of concern for wildlife/birds/fish species. Degraded areas should be replanted ASAP.
- Stop using the idea the secondary growth timber is encroaching. Many of our big game winter ranges need more timber cover, e.g. Sawmill Gulch. "Encroaching" – the term doesn't even exist in plant ecology nomenclature.
- There should be NO commercial wood development on public land.

## Question 3: What benefits are important to obtain from forests and woodlands in public lands in the planning area and where should they come from?

**Benefits**

- Healthy forests & economy.
- Preserverd for now & in the future.
- $ for schools base on proper & appropriate forestry practices.
- If healthy, everybody gets to use it & it benefits everyone.
- Habitat for wildlife.
- Jobs (local jobs)
- Clean water
- Transpiration
- Issue of fir encroachment – need more management of this.
- Raw material – wood.
- Fire wood
- Posts – poles
- Jobs
- Utilize burned timber
- Fuels mgmt
- Wildlife habitat
- Recreation
- Use land available.
- Storing snow, wildlife habitat, recreation, and local timber products such as post and poles.
- Water should be emphasized as a critical resource.
- Management should seek to protect watershed.
- Harvest. Better wildlife area – big trees and etc.
- Since recreations and tourism is our #1 industry – not agriculture – that should be the top priority when determining whether to harvest timber in critical wildlife areas. Truly sustainable harvests such as post & pole and some timber is appropriate.
- We believe all the benefits and uses are important to obtain from forest and woodlands.

- Naturalness is a most important benefit. We have developed most of our lands. Public land should be conserved for future generations and for species, which depend upon it. Forests and woodlands are essential for biodiversity. Man should tread lightly.
- Harvesting the forest as a crop exhausts the land into infertility – sooner or later the forest disappears permanently as in other parts of our world. Pure water, clean air, temperature moderation, wildlife habitat and human enjoyment must take priority. A combination of prescribed burns and elimination of livestock grazing would do wonders for the forest.
- Big game habitat
- Upland bird habitat.
- Merchantable timber could provide some income for the BLM, just like livestock permitee fees.
- Increased water yield from all forestland.
- Reduce fire potential (ignition)
- Reduce fire fuel load (fire spread).
- Benefits from forests and woodlands include: wildlife linkage, especially for T&E and sensitive species, wildlife security, winter breeding and calving grounds, denning habitat, thermal and hiding cover and home range needs. These benefits should be provided in all areas of the DFO. In order to provide this, the DFO must first determine the needs of the important (T&B, sensitive) wildlife species and determine what habitat components must be protected in the RMP.
- All PUBLIC forests and woodlands should be managed for PUBLIC wildlife, with a particular emphasis on management for threatened and endangered species, or secluded species that depend on solitude, such as elk, mountain goat, wolverine, fisher, martin, and lynx.
- We disagree with the statement that the Centennial Valley is *"…not meeting the seasonal need of these species as a result of past sagebrush burning on all ownerships, competing livestock use, or habitat fragmentation."* If in fact this statement were true, a big part of the problem would be attributable to game management that has allowed elk populations to exceed plan objectives. Another problem is non-management of timber stands in the Centennial Mountains, which has severely decreased or eliminated forage in small meadows that have disappeared entirely due to encroachment.

**Other Comments**

- Current program status quo
- Travel restrictions
- Designated routes w/ agency control along routes.
- Educate people w/ agency-sponsored meetings.
- Mandatory compliance w/ MT law.
- Wash racks @ recreation facilities.
- Increased emphasis on prevention w/ enforcement.
- All of them in the tool box.

## *ISSUE #3:How will noxious weeds be controlled on public lands, and what conditions will apply to permitted activities?*

### Question 1: What natural processes, management activities and educational opportunities are appropriate/necessary/acceptable to manage noxious weeds?

**Biological**

- ONLY with non-toxic means.
- Emphasize the use of biological controls for noxious weeds.
- Leafy spurge – series of years *(of pictures)*
- Bugs wiping out spurge
    - Hollowtop.com
    - Sheep and goats on knapweed & spurge
- Biologicals – expensive, not sure of effectiveness
- Biological control helps
- If biologicals work, use them.
    - Work = slow down so can be controlled with chemicals
- If biologicals are effective, problem is too big to spray
- Goats & sheep help control leafy spurge. Need training to select for spurge.
- Houndstongue and goats don't work. Goats will eat everything else first.
- We recommend that the DFO consider, compare and evaluate the using goats, sheep and other domestic browsers to control large patches of noxious weeds until they can be eradicated, using service contracts.
- Sheep control larkspur
- Sheep for control – put back (sheep) for this problem
- Goats?? doesn't seem to work
- Good coyote food – diverts from calves!
- Use sheep & goats to control knapweed
- Cattle will eat very young knapweed
- Biological – bugs to control
- Spurge – real problem in Madco. Control prior to third year. Biological control – bugs & sheep
- Early grazing by sheep and goats
- Continue to evaluate biological control. Monitor for effectiveness
- try sheep – manage predators
- try biologic stress *(what is this???)*
- Look at biological controls. Start chemical controls at the urban vector.
- Sheep, goats and llamas are being used in areas now

**Chemical**

- After spraying, will usually naturally revegetate – especially when using long residual sprays *(ie: tordon)*
- Follow up spraying to ensure effectiveness
- Make sure <u>all</u> of patch killed
- Don't wait until patch big enough to spray
- Don't spray everything else, ie: non target species
- Encourage permittees to spray

- Chemical treatment another tool in the box
- Spray houndstongue and burdock
- Providing herbicide to permittees for application on permits might be an effective, lower cost way of controlling noxious weeds
- Must spray to control weeds – be careful around water
- Where there are roads, spray along roads as that is the easiest and *(causes)* least damage
- Spray – watch drift & follow label directions
- This is a big, big, big problem in Madison County. The only effective way I have found is by spraying every third year. Madison River is bad – we are controlling the west side with help of BLM to about 300 ft. of river but can't control this because unable to spray with plane in this area.
- I feel that a greater effort needs to be pursued to educate the recreating public as to what noxious weeds are and do to the lands that we love to be a part of. Next to this I feel that chemical control is by far the most effective though more costly way to control the weeds.
- Herbicides should only be used which are harmless to native plants and wildlife.
- Stop wasting money on weed control. Do you know that the BLM's 4 wheeler carries weed seed all over the hills and then the so-called weeds become established? Check your own vehicles for weeds and stop blaming weeds on the sportsmen. BLM uses this to close public lands.

**Other Controls & Education**

- Require contractors to wash their equipment.
- Public education.
- Effective weed management requires a good monitoring plan.
- Include weed plans in the planning process for all land disturbance activities.
- Education as much as you can to prevent it from starting
- Prevent activities that introduce noxious weeds. Ie: road building – Every thing introduced noxious weeds
- To control noxious weeds = withdrawal of recreation
- during hunting seasons sponsored by sportsmen's groups
- Need funding, manpower, organization to take care of weeds
- Need to focus on what type of plant *(we)* do want
- Spraying focuses on plants we don't want
- Encourage & stimulate beneficial plants
- Use an array *(of methods)* to control weeds
- Encourage local people & groups to adopt section to watch for weeds – *(assist with)* licensing
- Education to the public – how we spread what's noxious, how wildlife & vehicles spread. SHOW them. Demo plots or areas
- Fire has beneficial results. Enables native plants to return
- Grazing – tool to help in those areas where you can't spray
- Pamphlets, the more distributed the better. Pictures
- Handpulling
- Put prisoners to work Put 'em to work
- Must take care of weeds on all lands
- Else wind up like Missoula
- Noxious weed control should be a responsibility of all staff. Carry sprayer in vehicle like a fire extinguisher. Document (GPS) spot treatements to allow easy follow up applications later.
- Prevent seeds from coming here is better than spraying weeds
- Fleecer Mtn – cattle grazing managed to improve elk habitat

- Public education – hunters etc.
- plug in public
- access Is the vehicle of problem
- limit access
- check outfitters out – clean it up
- knap(weed) follows roads
- BLM controls is weeds
- make it a priority
- Limit access – driving
- Control this problem – bust people
- Permits for access for stock – to maintain
- Irrigate to kill cheatgrass instead of spraying
- Regular weed education in paper
- Do not use noxious weed*(s)* in photography or advertising
- Require weed free hay for outfitters, etc
- Use weed seed free materials for forage and restoration/reclamation work
- Use all cultural as well as chemical & mechanical means. Fire as part of management for certain weeds (houndstongue)
- Keep after it, be diligent
- Control them when they start. Use something that will kill the weeds
- Proper funding to take care of weeds
- Weed sprayers contact people on the land to find out where weeds are – better communication
- Coordinate management so weed control is effective – do not create designations that will make fighting weeds harder
- We recommend the use of GPS technology to map weed infestations and allow for easy follow up treatments
- cooperate – adj*(acent)* jurisdictions MDOT
- pull weeds
- Current program status quo
- Providing signing and/or brochures at access points might help educate the public about noxious weeds
- Travel restrictions
- Designated routes w/ agency control along routes
- Educate people w/ agency-sponsored meetings
- Mandatory complicance w/ MT law
- Increased emphasis on prevention w/ enforcement
- All of them in the tool box
- We need to expand the discussion to exotic species. We'd like to see a BLM map of the weeds including crested wheat grass, Timothy and Kentucky blue for example. In the RMP alternatives, we'd like to know what kind of control the agency envisions doing
- We'd like to see coordination with Idaho. For example, they don't have the same list of what's "noxious" so some species could be ignored just a few miles away.
- We recommend that the DFO control weeds consistent with Montana Noxious Weed Law at MCA 7-22-2116.
    - By "control" we mean to kill or at the minimum, prevent from going to seed.
- We recommend using all effective means of controlling noxious weeds, including: grazing, browsing, burning, spraying, hand pulling, mechanical and biologicals such as bugs and pathogens.

    - By effective, we mean they have been demonstrated effective in the "control" noxious weeds in the planning area.
- Livestock grazing removes native vegetation and allows weeds to grow such as cheat grass, which is not palatable
- Manage to prevent soil erosion and stream bank erosion.
- Volunteer activity to pull knapweed.
- BLM Digest of weed control. Some weeds considered noxious are native.
- Objective should be to prevent further spread of weeds.
- Existing weeds should be inventoried.
- Resource managers should be educated so that they can recognize noxious weeds.
- Educate land users, and particularly hunters.
- Biggest spreaders of weeds are cattle, wildlife, birds, and wind. Too much emphasis on sportsmen spreading weed seeds, its everyone's problem.
- All types of weed control should be used.
- Work well with counties on week control.
- Educational opportunities to show how weeds can be spread – pamphlets to schools, car wash, calendars, word of mouth, ads, signs.
- BLM should offer a bounty for noxious weeds that are brought in.
- Since there are so few known "sensitive" plants, those that may need special protection could easily be protected with pyramid type wire cages—including plants on ridge tops where mineral or supplement is placed. Cages would also provide a good monitoring point. However, to use the limited information and input referenced, to control the management of the three areas mentioned on the basis of "sensitive plants", would create an imbalance in the overall ecology of those areas. It could also place an undue burden on those who depend on natural resources for an important part of their livelihood, and consequently the economies of the communities served.
- Certified weed seed free forage.
- Seeding of native grasses/plants should be attempted in appropriate areas.
- Have boot washing sites set up that are manned by Sierra Club and Wilderness Club groups (at their expense) since they have been hiking around for decades and contaminating our forests and mountains with non-native weed seeds, bacteria, germs, and tiny snails. Put pressure on the scientists to graduate students as MSU to come up with biological controls.
- Perhaps the permitees could be encouraged to handle small infestations through reimbursements
- They are the ones who know where infestations occur and probably have the equipment, which they use, on their private ground. The BLM should probably handle large infestations especially on land accessible by motorized travel.
- It is important for the BLM to control noxious weeds on their parcels, in particular spotted knapweed. Agriculture lessees have historically kept their leased parcels as weed free as the surrounding private land. If the push is on to let others use the land there must be provisions for control and spread of knapweed, including restricting vehicle travel which has proven to be the fastest spread of noxious weeds.
- Ranchers, road maintenance crews, school children and local communities should receive education and information on how to control noxious weed seed dissemination, how to identify and eliminate same. In NM, the Santa Ana and Sandia pueblos are having major success in removing salt cedar from their lands. Maybe they would share pointers with you. Get native plant clubs to take on projects for you.
- Develop a plan to address the causes of the spread of noxious weeds instead of just dealing with them after they have become a problem. That plan must include identification of the sources of the spread of weeds, including off road vehicles, domestic livestock grazing, roads, timber

harvest and other land-disturbing activities. These weed-spreading activities must be curtailed, stopped or otherwise addressed in the RMP revision.

- Numerous livestock producers have indicated that intensive livestock grazing during certain stages of weed growth results in the reduction of noxious weeds. Specifically, seed production can be minimized or curtailed by livestock grazing. In riparian areas where grazing has been excluded, canada thistle appears to be more common. Spread of shrubby cinquefoil appears to occur in areas where upland utilization is limited.
- Effective control measures are often also disruptive, killing other species unnecessarily, and depending on what is involved in taking those measures, they can create other negative impacts (erosion of land-forms, for example, and human and wildlife health hazards, for another example). They need therefore to be chosen and carried out so as to be least disruptive for the least amount of time to the environment involved and to human beings.

**Vehcicles, Roads and Travel Management**

- Closing roads that are used for timber harvest or livestock operations would go a long way to keeping weeds contained to smaller easily accessible areas for control
- No off road/trail motorized use
- Enforcement of the OHV EIS eliminates motorized cross-country travel. Cross-country travel results in a proliferation of roadways that act to spread weeds.
- The BLM well knows that road corridors are the main areas for noxious weed infestation (page 89, AMS). This (AMS) proposal would legalize and advertise (via maps) hundreds of miles of once little known roads and motorized routes.
- Weeds follow roads
- We recommend the DFO maintain (grade) roads to minimize disturbance and prevent them from becoming seedbeds for noxious weeds
- Coordinate to programs of private groups to promote awareness and clean vehicles, e.g. car washes
- Off road vehicles further spread weeds – control their access.
- Keep them on the trails.
- No new trails/roads - But need roads & trails to get in to areas for management purposes Roads can be reclaimed
- Truck wash at mouth of Big Sheep, Centennial and similar areas.
- Keep ATVs on designated routes
- User created roads spread weeds.
- Require steam cleaning of ATVs and all wheeled vehicles before entering BLM land.
- Control travel to minimize weeds, vehicles stay on roads
- Weed washing of logging, road const(tuction) and gen*(eral)* public – education
- Rarely & judiciously add new designated routes to control weed*(s)*
- Enforce ORV *(off-road-vehicle)* restrictions
- Education programs
- Manage people
- Wash racks at recreation facilities
- ORVs disseminate weeds on public lands. ORVs aren't feeding families (like logging does in some areas, for example). There is no balance here – there is over 900,000 acres open to ORVs and 56,000 closed. In 50-100 years we are going to be amazed at how weeds took over. Land managers are not controlling ORVs. It's a problem on private land too. The cycle affects the health of lands throughout the area. I'm surprised that every rancher doesn't insist on this (Limiting the use of ORVs much more).

- ORVs carry the seeds but they also leave exposed soil. We have to look at integrated pulling and chemicals and prevention. Snowmobiles are now spreading weeds and leaving exposed soils.
- In some places weeds are replacing native species. This increases runoff and degrades water quality.
- The more we use the land the more we weaken it. If we weren't using it so hard we wouldn't have this problem.
- Car wash to get rid of weed seeds prior to hunting season is a good idea.
- Methods other than chemical must be found – also all hay and grain trucks moving across public lands should be covered. It does no good to keep spraying weeds with expensive chemicals and at the same time allowing contaminated hay to be hauled on every road the byway in the state

**Problem Areas**

- Aggressive, extreme road grading occurring in allotments that is making perfectly prepared weed beds along the roads that are then ripe for weed infestations, especially given the amount of hunting traffic that some of the roads get in the fall.

## Question 2: Are there any areas or circumstances where these processes and activities are not appropriate? Why?

**Impact Analysis**

- We want to controls weeds in everywhere, but use different tools in different situations
- Select plants – be careful
- No!
- Incentives for sheep people – goat people – reduce charge
- I can't think of many but it is going to take millions of dollars to get control on BLM and private land.
- No.
- We suggest that an adaptive management approach will determine this on a site-specific basis and provide for the most compatible levels of use and mitigation.
- Prevention rather than action after the fact.
- Manage the perennial vegetation and it will control weeds (annuals). Annuals us these because of disturbance or soil loss.
- Manage the perennial vegetation using the concepts and principles of rest-rotation grazing and perennial vegetation will be established. Annuals are there to hold the soil in place due to mis-management of the perennial vegetation. Have you looked at the Frying Pan area lately? Looks like a biological desert.
- This plan should include a map that includes all weed infestations and identification of any weed control projects it has planned.

**Chemicals & Spraying**

- Don't spray in areas of sensitive species (e.g. butterflies)
- Herbicide use does not make sense over large acreages, because they promote weed growth. They initially kill weeds and the other plants, but then the weeds come back and are able to out-compete the other plants.
- Herbicide use should be limited to travel routes and small weed patches.
- Spraying is a waste of money.

**Water & Streams**

- Be careful around water
- No chemical controls along streams
- Likewise, areas that include streams and lakes and reservoirs need special care in the way weeds are controlled, particularly if the control measures involve the application of poisons.

**Wilderness and WSAs**

- Wilderness and wilderness-study areas should be managed differently, and both weeds and permitted activities controlled in a fashion appropriate to the character of the area and to the reasons for its being set apart with the special designations in question.

## *ISSUE #4: How will the sage grouse and westslope cutthroat trout conservation strategies be applied in the planning area and how will they affect other public land uses?*

## Question 1: How should BLM determine where sage grouse and westslope cutthroat trout conservation strategies should be applied?

**ESA and/or Other Special Status Species**

- Manage for native species over non-natives species
- Evaluate effects of sprawl on intermingled private land and include the results in criteria for land exchange.
- Grayling should be added to the list. This will require coordination with FWP since FWP may have to re-introduce it.
- The BLM has a legal obligation under the Endangered Species Act to protect T&E species habitat.
- The DFO has a duty to manage the habitat of these species to aid recovery and overall health and distribution of these species.
- For all species of special concern (including but no limited to bighorn sheep, sage grouse, grayling and weststope cutthroat trout) andfor all T&E species, the BLM must identify important habitat components for each of these species, and using the best available science for each species, identify the necessary management actions and habitat standards that must be implemented in order to achieve recovery of each of these species within the DFO. The determination of which actions to take to benefit these species should be based on the science, which in all cases, is well-known. This should occur on the watershed scale
- Manage the upper Beaverhead River drainages for native fish; think bigger than the 84 miles of streams that are under consideration as an ACEC. Also protect grayling habitat

**Implementing Conservation Strategies**

- Define key habitat areas for emphasis so that sensitive species do not preclude other uses in areas that are not critical for the sensitive species.
- In areas where declines of the species have been observed, currently and historically. On-the-ground observation/research methods should be used to identify current areas.
- The hunting and fishing associations and clubs have to help you with this issue.
- BLM should get out of the species responsibility. BLM is supposed to concentrate on HABITAT. Population management is FWP's NOT BLM. Refer also to Master MOU.
- There may be higher and better uses in some key areas. Make sure that analysis is adequate before allocating areas for sensitive species and precluding the other uses.
- ***See Matator Cattle Co. comments, 3/10/03 – p. 5***
- Regarding the protection of habitat for WCT and sage grouse, I heard comments at the meeting that strategies to protect them shouldn't get in the way of other use. This is backwards from my perspective. Other uses should not get in the way of preserving habitat for these species. Strategies should be evaluated of the basis of how well they work toward the objective of preserving not only habitat but viable populations of those species. Survey the populations to get a baseline and monitor results of the strategy. If populations continue to decline, tighten the protections.

- Conservation strategies should be applied where they have the greatest chance of being successful and where they will have the minimum impacts (including mitigation) on other uses. Their implementation should not disproportionately impact any use.
- ALL PUBLIC lands with sage grouse and westslope cutthroat trout must be managed to protect and enhance sage grouse and westslope cutthroat trout. Public lands where sage grouse and westslope cutthroat trout have been extirpated, must be rehabilitated so they once again are hospitable to PUBLIC wildlife.
- Establishing and managing for productive climax vegetation every year in known nesting and brood rearing areas for sage grouse would serve to mitigate the inevitable effects of drought on a regional basis (Beck and Mitchell 2000, Hockett 2002, Prellwitz 2002). We feel this is an excellent idea for sage grouse and other fish and wildlife in southwest Montana. Please analyze and discuss the pros and cons of establishing climax vegetation at the landscape level on an ecological or watershed basis as an alternative in the Plan(s).
- Before application or implementation of any conservation strategy is taken by BLM through some type of a management practice, the principles of sustained yield, multiple use, and local economic impact must be reviewed.
- Make sure strategies will achieve goals for which they are intended – monitoring for effectiveness
    - establish monitor/control points
    - create benchmarks
    - trout – apply to viable populations
    - minimize impact on M(ultiple) use
    - I.D populations – why working there?
- evaluate grazing impacts Degree of latitude in implemention of C.*(onservation*) S.*(trategies)* with all input from all concerned statekholders
- Input is needed from the Montana Department of Fish, Wildlife and Parks and sportsmen concerning the presence and disappearance of sage grouse and westslope cutthroat trout.

**Westslope Cutthroat Trout (WCT)**

- Adopt the West Slope Cutthroat Plan in the RMP and use the RMP to ensure adherence to the plan wherever they have been identified.
- WCT- problem created by introducing fish, browns, brooks & rainbow
- Put *(WCT)* in streams with natural barriers
- *(put)* upstream from places that can be isolated ie; reservoirs
- Introduce or protect where they can be isolated Hard to find those spots
- Don't like idea of poisoning other fish species
- What we recommend is that BLM stick to its policy of providing "minimum level of protection" as far as grazing is concerned. However, in areas where WCT are located, a well-planned grazing system should be implemented, preferably 3-pasture rest-rotation to improve forage cover and bank armoring, and decrease sedimentation from runoff (including fire). Also, encroachment should be addressed to help prevent the dewatering of streams and lack of adequate filtration. Some of the pure species of WCT have their headwaters in the Centennial Mountains. The most imminent threat to them right now, aside from continued drought, is wildfire due to a tremendous fuel load from bug-killed trees and lack of timber management for at least 40 or 50 years. Any management that severely curtails consumptive use, (i.e. forage and timber management) in the name of "protection" for the Centennial Mountains, will do more harm than good
- Netting or shocking better than poisoning. Maybe scientist can come up with better ways.
- Check out creeks that don't have fish, maybe they can be improved to support WC trout.
- Keep irrigation as it isolates populations
    - Simpson Creek
    - Meadow Creek

    - Muddy Creek – situation of mud
- WCT – protect streams, manage waterways more carefully. Isolate from rainbow trout
- Prioritize reintroduction in areas with natural barriers
- Where they did proliferate & now they don't
- I have documented proof of a high concentration of adfluvial "Westslope Cutthroat Trout" inhabiting the Axolotl lakes chain that are in excess of 30 inches and weigh over ten pounds and again would challenge the staff to identify other instances or areas equal to this environment that support a fishery as unique as this one.
- BLM should follow FWP strategies (or most up to date science) for avoiding hybridization (trout)
- Protect them wherever you can
- WCT – greatest threat crossing w*(ith)* rainbow. Introduction of non-native brook trout
- Removal of non-native species & build barriers
- Think BIG: the habitat is large.
- These fish are basically extinct.
- Do they really know how many WCT there are – should know
- Look at where & why WCT are where they are
- BLM, B-DNF, & FWP work to find out answers to questions
- If concerned *(about populations)* why are we fishing for WCT
- Make sure the stream carries enough water in August and drought.
- Overgrazing also affects watersheds where westslope cutthroat trout live.
- On fish: watershed-based planning usually works.
- Manage water quality for cutthroat trout – (see comments under issue #2 & #5)
- Both westslope cutthroat trout and grayling are near extinction, and ESA listing petitions have been filed. The condition of these fish reflects the non-functioning status of the streams in the planning area.
- Listing would create a takings issue for these fish.
- Strategies for westslope cutthroat trout, e.g. maintain water temperature, where the fish are found, make sure stream carries enough water in August and in drought.
- I feel that if people want to keep the cutthroat trout pure they need to construct barriers to keep other fish from inner breeding.

**Sage Grouse (SG)**

- Emphasize conservation of sage grouse in grouse strongholds and coordinate with FWP; emphasis areas should include Big Sheep Creek and in the Centennials.
- Those management actions such as Montana's Sage Grouse plan that have been arrived at using the full array of science available, and that have been developed with all interested parties at the table, should be incorporated into BLM planning documents.
- Evaluate the effects of sagebrush spraying and burning on critical habitats.
- Stop destroying sage grouse habitat.
- Under the BLM guidelines sagebrush must be protected to provide for sage grouse habitat
- If there aren't many around, don't hunt them
- Mainly in low grounds – sagebrush flatlands
- Over graze selects for more sagebrush
- Correct grazing manages for grass and less sagebrush & grouse
- Places of grazing are good SG habitat.
- Don't trail cattle through sage grouse habitat during nesting.
- Timing & duration management
- Look at history (of high SG pop) replicate practices, predator control

- Wooden posts better than steel
- Think BIG: the habitat is large.
- Sage grouse must have sage and understory to survive. Grouse numbers are down.
- Limit grazing and burning in sage grouse areas.
- Hunting of sage grouse should not be allowed because the species is declining.
- Sage grouse – ecologically not easy because their habitat goes into Idaho and requires interstate coordination.
- Do we really know what is ideal habitat? Observe*(d)* grouse where habitat "not good" and not grouse where habitat is "good". See grouse on N side McCarty hills, not much sagebrush. Good habitat w more sage not observing grouse *(Bill Garrison)*
- Are we managing for habitat that grouse want/use?
- If we want to increase grouse, need to reduce predators.
- Is hunting grouse a good idea?
- BLM should collect information about historic sage grouse habitat.
- Sage grouse dependent on sage – protect sage lands – burn less, restrict housing development, aerial spraying, conifer encroachment.
- Lots of areas where sage grouse have disappeared. Early mistakes destroyed much habitat.
- During severe winters wildlife depend on sage also.
- Sage grouse – there is enough habitat but too many predators and most of them are being protected.
- On BLM lands that have been overgrazed and have excessive timber harvest. Young sage grouse need forbs and water and cover to survive – predators play a big role in decline of sage grouse when there is little cover or feed for them. Overgrazing and sagebrush burning are the biggest culprits.
- Mosaic pattern of veg is good.
- Rest & rotation grazing, like Wall Crk.
- Scientific peer review is needed
- ***See Matador Cattle Co. comments of 3/10/03 – p.3***
- Look at big picture on sage grouse. Ferruginous hawk is increasing and eating sagegrouse.
- Habitat in Idaho plowed up. Big Sheep S*(age)* G*(rouse)* wintered in Idaho. Big Sheep still good habitat. Migrated out of Idaho to Big Sheep for summer.
- Why up bag limit & season for S*(age)* G*(rouse)* last year? Should not hunt S*(age)* G*(rouse)* if there is a problem with populations
- 3 studies in Big Sheep in 50's & 60's *(on sage grouse)*
    - Neal Martin (sp?) from Miles City
- WCT – Elk impacts on WCT streams
    - "bog hole" = manage all resources, everything
- Cattle grazed for 150 years and this year we fence cattle
- Where to apply
- Grazing issue – doesn't benefit isolation
- history idea – its worked, why change
- Ravens/Grouse
- issue is Idaho farming
- come from there (Idaho)
- apply in other plans
- other predators
- is there a cycle?
- What are impacts on grazing, timber, water, lifestyle, recreation, historic use?

- Control their restrictions
- limit bag limits
- limit rec.(reation) use, etc.
- make sure controls are a better step
    - fences vs no fences
    - weeds vs no weeds – police this
    - cost share
- pay costs of effect – same w/ elk
- What happened to grouse on VC hill?
- Is sage growing old & decadent affecting viability for grouse habitat
- Lack of fire cycles affecting sagebrush
- Rochester? basin or Camp Creek? burned by Siedensticker? and increased grouse
- Look at the habitat to see what the entire picture is of the resource values. Then manage for the greatest value. It may be that sage grouse falls by the wayside.

## Question 2: What and where are your greatest concerns with implementing these conservation strategies?

- Timing – schedule fire, etc - Limits sagebrush management
- Look at predators – impacts
- Don't lose focus on multiple use
- Don't lose use of public lands
- Disappointed that ACEC didn't make it in. Need to shift paradigm to say, "we'll manage for sage grouse – which is tied to sage BRUSH and RIPARIAN areas."
- One concern about the conservation strategies is that they would be so diluted and watered down by the dominance of cattle grazing that they would be effective.
- What we see is that existing planning is mitigation. We want BLM to shift to proactive management; we want to think fundamentally differently about how the land is managed.
- DFWP should set a conservation bag limit for sage grouse.
- Separate sage grouse from westslope cutthroat issue.
- Need interagency cooperation. to prevent the sage grouse from becoming endangered.
- All over southwest Montana, BLM must adhere to MOU on sagebrush burning; there should be no exceptions. BLM will not monitor overgrazing and riparian areas closely enough to save cutthroat trout or sage grouse.
- That they won't happen because of pressures from industry.
- I don't want to see other recreational activities such as rock hunting pinched out by one other concern.
- BLM overstepping their habitat responsibilities and becoming anti-hunting and pro-endangered species.
- My greatest concerns about the sage grouse/cutthroat relationship with livestock grazing turn out to be another spotted owl-timber industry relationship. Everything possible should be done to ensure there is not a movement to use the sage grouse/cutthroat situation to crowd out livestock permitees.
- Extremism will prevail – use strategies to stop needed activities to benefit other resource values – use to stop tree removal and fire activity.
- Stream condition affected by overgrazing.
- Wherever a known cutthroat stream connects to another stream that doesn't have a pure strain of cutthroats.

- Biggest threat to ws cutthroat is other species of fish and drought.
- Greatest concerns are that the DFO will fail to adequately protect sufficient quantity and quality of habitat to provide for the viability of abundant, well-distributed populations of WCT, sage grouse and other sensitive and T&E species.
- Conservation strategies should not be applied nor made the basis of a management decision until a scientific basis exists to do so. First, and foremost, population data needs to be collected. For example, the current trend in Southwest Montana is towards an increase in sage grouse numbers. Once population data has been identified, the second step is for range scientists to analysis the habitat use and needs of the current population objectively based on sound range ecology principles.
- Our greatest concern is that sage grouse and WCT will be used by litigious entities to curtail multiple use on public lands. We also have concerns that these entities might prevent the effective recovery of these species in order to perpetuate this situation. We are also concerned that these strategies will not be science based and/or their implementation impartial
- Any time you manage for one end, there is possible limitation on management activity and human uses that relate to other facets of the environment. But the two species in question are important native components of the ecological area that encompasses BLM land, so that I have no negative concerns with implementing the strategies that have been-- or are being-- developed.
- One area of concern is in regards to the sagebrush and sage grouse. believe there is a link between the decline of the sage grouse and the process of continuing desertification of the west. (I hope you included my article "The American Sahara" as a comment on the RMP. I submitted it when you first asked for input sometime last year.)
- ***See Gallatin Wildlife Assoc. comments, 2/12/03 – pages 6-15*** regarding sage grouse habitat. We believe there are too many roads fragmenting and degrading important fish and wildlife habitat within the project area. By the early 1950's, it was recognized and documented that too many roads and/or too much off road vehicle travel had significantly degraded and fragmented sage grouse habitat and contributed to the sage grouse's demise in Wyoming (Patterson 1952). Roads, especially on BLM lands, continue to be a significant and expanding problem in sage grouse and other wildlife habitats on the project area (Personal Communication with BLM and USFS personnel).
- Drought usually results in significant adverse impacts to sage grouse habitat and populations throughout their range (Connelly and Braun 1997), and is believed to be a significant factor in sage grouse populations declines in Montana (Dusek et al. 2002, Eustace 2002). Drought significantly limits herbaceous cover and forage available for sage grouse (Patterson 1952). Livestock grazing is cumulative to the adverse effects of drought (Patterson 1952, Hockett 2002) and livestock grazing has been identified as a major factor in the range wide decline of sage grouse (Connelly and Braun 1997).

## Question 3: What opportunities exist to implement conservation strategies while minimizing effects to other public land uses?

- Coordinate w/ travel management
- Fish barriers
- Unlimited catching below *(barriers)*
- Isolate populations
- Good sediment barriers
- Mosaic burns in sage
- Limit mono age sage
- Inter agency approach / MDFWP

- Few if any!
- Need to be a C.S. specialist to answer question
- DFWP should set a conservation bag limit for sage grouse.
- The state is developing a conservation strategy for sage grouse.
- Closing the sage grouse hunting season until an acceptable number of grouse are available to harvest. Perhaps a limited drawing for hunting permits as with antelope.
- Implement workable rest rotation grazing systems following Gus Hormay's guidelines. Step spraying and burning sagebrush for the sake of more grass. This has proven useless because when the grass is overgrazed, weeds and rabbit brush take over. Set up pasturing systems that work – this will help wildlife, fisheries, sage grouse, and watersheds.
- It would appear increasing predator populations are related to decreasing sage grouse populations. Where sage grouse are a sensitive species, their management would have priority over non-listed predator populations.
- Construct/maintain fish barriers to protect the purity of WCT streams.
- ACEC designation is not suitable for the protection of wildlife. First, the DFO does not have jurisdiction over wildlife species. The second problem is that wildlife migrate, adapt and move to new habitat, creating the potential for a wildlife ACEC without the wildlife.
- Wildlife should come first on public lands – above extractive and consumptive uses.
- Harm to wildlife should always be mitigated in some way to prevent continued loss of habitat.
- A reasonable, logical approach – stop the one size fits all concept.
- One option is to take seriously the use of ACECs as a mechanism to protect sensitive and T&E species habitat. Through ACECs habitat protection measures will be outlined and understood which will minimize surprises and uncertainty.
- ***See Matador Cattle Co. comments of 3/10/03 – p.9.***

## *ISSUE #5: What level of commercial or other authorized use should be allowed in the planning area, and what conditions will be applied to permitted activities?*

## Question 1: Are there any areas or circumstances where specific activities should be emphasized? Why?

**No or Never**

- No.

**Incompatible Uses & Values**

- Avoid ecologically intact areas with ROWs, roads, etc
- Worried about disturbance of public lands for private use
- Not a wildlife corridor, the barest land more appropriate
- No more PRIVATE commercial development of any type in PUBLIC wildlands.
- discourage extractive
- Commercial outfitting in WSA's
- Activities should only be emphasized in areas where the activities are not harmful to the land and wildlife and where conflicts with other public land users are minimal. Areas which are in relatively pristine state should be encouraged to help define areas of concern on public lands.
- Landowner Outfitters that privatize wildlife to sell and graze livestock on public land should be looked at closely. Good example is Turner Enterprise, Inc. High fences. BLM help build and pay for restricted movement of big game animals and he grazes his bison on our public lands
- Specific areas and activities include: the Centennials, Gravellys and Blacktails for their functionality as wildlife linkage for species such as grizzly bears, areas such as Sage Creek and Muddy Creek Big Sheep creek for sage grouse habitat and the Tendoy mountains for bighorn sheep habitat.
- Non-motorized activities should be emphasized on all roadless Lands.
- Overall, critical resources like roadless, winter range and other rare or sensitive species habitat must be emphasized in light of permitted activities.
- In general, any commercial uses should be secondary-- indeed, tertiary-- and always subject to conditions imposed by the primary aim of management (healthy land and land components) as well as by the secondary aim (non-destructive and non-exploitative human uses which have no commercial element).

**Compatible Uses & Values**

- Permitted uses need to fit into multiple use process
- There should be a place for all of it.
- Commercial uses should be allowed when they benefit the infra structure of our society. We need utility lines, roads, various mining ventures, logging, etc. and the freedom for recreation in our public lands.
- Commercial use to fullest extent possible in responsible manner
    - Fullest use = non-exclusive & multiple use or users
- Public lands should be used like they have been for the past 100 years if that is history
    - xcept critical
- Has to be used, grazed & logged to reduce fire danger. Provides economic benefit to govt and local economies

- To use is also to recreate & look at
- Encourage recreation base
    - Encourage = be liberal *(with)* recreation/commercial access
- Other commercial uses are necessary, provide year round jobs
- Permitted uses need to fit into multiple use process
- multiple use – most motorized recreation
- Seed collection, except for rare plants seems acceptable as does research and special rec. permits.

**User Fees**

- Access fee – to pay costs or not
- User fee controversial yes/no
- Fees could be used to defray costs of roads, weeds, search & rescue, etc.
- Allocation of funds controversial
- Lewis & Clark *(tourists)* won't buy hunting licenses *(Response to State of Montana including access fee in hunting licenses)*
- Multiple use – all users should share $ responsibility of cost
    - Hard to charge for bird watching
    - Out of staters will stop coming if charged.
- Maximize as many uses as possible
    - grazing fees – charge for other uses
    - charge for recreation use
    - charge to maintain these
    - Mutliple use – equitable charge
    - Authorize recreation

**Impact Analysis**

- More public use, less permitted use last 10-15 years. Grazing, timber, mining, downward trend
- Recognize role some permitted activities play in proper management of resources
- Coordinate with other agencies on permitted uses.
- It's BLM's job to manage it
- There should be an equitable process for all parties interested in commercial activities. The current process seems skewed to area landowners
- No one should be restricted
- Look at situation, site specific
- Sensitivity to what area we're doing it in
- What are the risks of X use vs. risks of not doing it
- Not special interest driven
- Would need proper public info.
- Evaluate and monitor the sound environment. Minimize noise on all BLM land.
- Develop a baseline for analysis of noise, e.g. I do not like to hear helicopters when I am hiking in remote areas in Glacier National Park
- It is critical that the BLM understand, and communicate to the public, the cumulative effects of permitted activities on the public's resources, both now and in the foreseeable future. Conduct a cumulative effects analysis so that this information is understood. Determine the effects that various permitted activities have on key resources
- Stay off bad roads when wet Control this use
- Out of state/etc/Better signage, directions
- Increased education about recreation transferring invasive species & diseases
- More public use, less permitted use last 10-15 years. Grazing, timber, mining, downward trend

- Recognize role some permitted activities play in proper management of resources
- Coordinate with other agencies on permitted uses.
- Commercial activities are a privilege, not a right
- Related to road right of way: private landowners cannot deny access to public lands (or shouldn't be able to). BLM should close roads on public land where private landowners don't allow access or deny permit.
- Some of the enumerated uses involve permanent modifications, which will forever detract from character of the land, and the cumulative effect of such modifications not only fragments the land area and its natural systems but soon decreases significantly the suitability of the area generally for achieving the secondary management aim as well. I include here utility transmission and distribution facilities, communication facilities, road right-of-ways, sand and gravel pits, bardrock mineral development, oil and gas development, wind-energy development: I know from personal experience on land I own the impact of utility transmission facilities, communication facilities, road right-of-ways, and oil and gas development, and strongly oppose such development on public land except in case of a clear national emergency and a lack of any other alternative.
- In the conflict between commercial uses and non-commercial (even the same sort of use, as in hunting), the money-makers should take a back seat, even though they say they should be in the driver's seat-- for after all, look at the benefits to the local economy etc. If we try to do that, there is no end to the demands that will be made in the name of local economic need upon land that belongs to all Americans and is to be managed for all, not just or mainly for locals!
- Need a certain amount of use in most areas. Gravel pits are important to counties – on BLM land. Pits must be reclaimed
- Where fires can be a problem only costing a lot of money to fight, grazing and logging will provide jobs and money to our economy.

**Specific Locations - NO**

- Less outfitters in Big Sheep (fishing)

**Specific Locations -YES**

- Rock pit in Big Sheep canyon closed. Only good source of rip rap rock for stabilizing streams in area. - Should remain open to public
- Centennial gravel pit needed

**Guided Recreation**

- Monitor the outfitters and guides uses of public lands very carefully. They shouldn't replace or interfere with public land users. A written policy should be implemented or enforced. Proper public input on all public lands uses is critical since the public foots the entire bill through taxes. Sound multiple use practices that are sustainable must be the form.
- Do not allow for increases in commercial hunting and fishing on BLM lands
- (incompatible) Commercial outfitting in WSA's
- BLM should implement any strategy for privatizing or commercializing public resources, e.g. allowing outfitters and guides on the Big Hole and Beaverhead Rivers, permits for non-resident hunters, and managing access, with care so that the public does not feel pushed aside

**Livestock Grazing**

- Consider the full ecological and economic costs of livestock grazing and production. Production means not only the "gazing or cropping" of grasses, but the other indirect and direct effects that are associated with livestock production.
- I would also like the BLM to evaluate the desirability of permit retirement buyout and permanent retirement of grazing allotments being advocated by NPLGC.

- The Plan should define rest-rotation grazing. ***See Gallatin Wildlife Federation comments, 2/12/03, pp. 30-32 re: grazing management***
- There are excellent examples in Beaverhead County that demonstrate the benefits of properly managed grazing systems that can actually enhance natural vegetative cover, and provide excellent filtration during periods of severe runoff. Easily documentable examples can be seen at the Basin Creek exclosure in the Sage Creek R/R Demonstration Area (Exhibit 1); and, on the EF Blacktail Game Range in contrast to the neighboring private Matador Cattle Company meadows in the Landon Fields ***(Exhibits 2 & 2A). See also Matador Cattle Co. comments, 3/10/03 – p. 7***.
- Grazing is a necessary and historic use of the land and a very good management tool for grass lands.

**Mining**

- mining – extractive - Newer operations are reclaimed

**Oil & Gas**

- We <u>can</u> use this land for oil & gas. For everything, <u>if it is done right</u>. Can be done without damage.
- Ex. Colstrip reclamation is a big improvement
- Not opposed to oil and gas leasing on public lands. We need to be self-sufficient
- Oil plan can be changed to make it right.
- Lease land for oil and gas – national need for products.
- Look very carefully at oil & gas

**Wind Energy**

- not around Virg City
- not in high scenic value areas
- concentrate in (an) area, not distributed
- areas with development like highways, where demand is
- Evaluate the potential for wind generated energy and evaluate the visual
- impacts; would prefer to not see any wind generators on BLM land. Consider birds in wind generating.
- I request these (wind) areas be given a clearer identification; i.e.; located so many miles south or northwest or east of a known town or ... lying within the directional area of a certain county or mountain range, etc.

**Forest Products**

- Use to achieve other goals
- weigh for spec. problems
- travel mgmt issue – emphasize use/limits
- wood prd from high growth areas
- I.D. good production areas – use them
- ATV areas
- Include recreational use in the analysis of areas with the potential for Timber harvest.
- 10% forest used and mgt for forestry timber production
- Accelerate treatment of commercial forest lands – in areas identified in the plan as commercial – to reduce the potential for fire, to reduce bugs and to increase water yield.
- In addition to the uses discussed in the RMP Digest, we would recommend an examination of utilizing forest health treatment materials as biomass for renewable energy production.
- Logging again is a good management practice for mature timber areas.

- There needs to be a greater tree harvest.
- Only 6% of commercial forest treated in past 50 years. (BLM statement) if all treated at this rate, it takes 800 years.
- Reduce fire fuel load.
- Increase water yield
- Commercial harvest should be limited to very small-volume sales for locally processed and consumed forest products only. Otherwise, harvest should be limited to domestic and farm and ranch uses like firewood, posts and poles, and house logs

**Rock & Mineral Collecting**

- On mineral collection the main thing is "right of succession." We are interested in education for kids. There is the right of discovery. There is nothing like this for kids – it really makes them want to learn. They then learn how to take responsibility for the land themselves. Mineral clubs are talking about repairing areas that need to be restored.

## Question 2: Are there any areas or circumstances where specific activities are not appropriate? Why?

**No or Never**

- Commercial logging, strip or pit mining, ORV/ATV abuse are NEVER appropriate for PUBLIC lands.
- Benefits deriving from economic and commercial activity which uses public land are definitely secondary. I include here not simply grazing and commercial timber harvest, say, but also the operation of hunting and fishing guides and outfitters on public land. Economic-commercial motivation, as such, makes for pressures on use and exploitation which know no inherent restraint.
- there is too much work to be done to undo past and present damage, and too much need for space and opportunity for the non-destructive and non-commercial use, to think that BLM could do what is needed in these regards and also allow and oversee an increase in commercial activity.

**Wilderness & WSAs**

- No commercial outfitting in WSAs
- This goes right to wilderness study areas. People who manage these areas seem to be ignoring pp. 20-46 of the Interim Management Policy. It has directives about monitoring, cumulative effects, wilderness qualities and solitude. BLM should be using its own existing policy.
- There is a road in Muddy Creek area (the person put it on the map) – it's in the Hidden Pasture Wilderness Study area. That road is not appropriate. It's in violation of the Interim Management Policy. Also: this is bighorn sheep and sage grouse habitat.
- Wilderness Study Areas should be non-motorized and user established roads closed
- Oil & gas (use "no surface occupancy where needed") – wilderness where "slant drilling" is not possible.

**Travel Management**

- Limit on use size – motorized vehicles are getting bigger and higher horsepower
- Stumped – restricted travel & designated routes
- Don't permit motorized rendezvous
- Motorized use off of established roads and trails should be prohibited because of resource damage.

**Fish & Wildlife Values**

- Elk calving areas seasonally
- other seasonal closures
- nesting areas – wintering areas
- limit travel to sage grouse / CTT *(WCT)* areas
- There is a road in Muddy Creek area (the person put it on the map) – it's in the Hidden Pasture Wilderness Study area. That road is not appropriate. It's in violation of the Interim Management Policy. Also: this is bighorn sheep and sage grouse habitat.
- Creeks for water quality/fish. Should limit activities that damage the top 2 priorities – water and wildlife
- Areas not appropriate when protection is needed – elk calving and cover, sage, decreased or severe impact would occur to native birds and wildlife
- Wait until Bighorn sheep are caught in the Willow Creek fences. What will BLM do? Max. height for a fence in Bighorn Sheep area is 31". It is totally not appropriate to open a section of land to public land to guides and outfitters when it already is leased for livestock grazing. At the very least, the livestock permitee should be notified and given the opportunity to big on any recreation permit that is being considered. When a livestock lessee has a permit that runs through hunting season, why isn't it reasonable to expect that potential conflicts between a rec. permit and the livestock could be avoided if one entity had both permits? If money is an issue, the ag lessee should be given consideration to match any bid. Management is a real issue.
- Extractive uses should not occur in areas of ecological concerns for species and their habitat
- BLM should be prepared to retire grazing privileges where major conflicts exist with trout, elk, bighorn sheep and their habitat, antelope, corridors and habitat for bears and bison, and outdoor recreation' Sheep allotments in bighorn habitat and cattle allotments in suitable wild bison habitat, in particular, should be retired
- Yes, critical wildlife habitats, migration corridors, strutting grounds, damaged watersheds, and riparian areas. Areas that have had continuous grazing – no rest.

**Water Quality**

- No drilling or hardrock mineral dev*(elopment)* in Axolotl Lakes area to protect water quality (of immediate area and VC watershed.)
- Creeks for water quality/fish. Should limit activities that damage the top 2 priorities – water and wildlife

**Oil & Gas**

- The only areas that should not be available for petroleum development should be designated Wilderness and riparian habitats.
- There should not be any drilling in Big Sheep Creek.
- One look and listen at the Roan Cliffs area west of Rifle, CO will show the reason for opposition to oil and gas
- Oil & gas (use "no surface occupancy where needed") – wilderness where "slant drilling" is not possible.

**Livestock Grazing**

- BLM should be prepared to retire grazing privileges where major conflicts exist with trout, elk, bighorn sheep and their habitat, antelope, corridors and habitat for bears and bison, and outdoor recreation' Sheep allotments in bighorn habitat and cattle allotments in suitable wild bison habitat, in particular, should be retired
- Areas that have had continuous grazing – no rest.

**Guides & Outfitting**

- Recreation use permits for outfitters and guides should not exclude the public from these areas.
- No commercial outfitting in WSAs

**Forest Products**

- Tree harvest – wilderness & riparian

**General Comments**

- ***See Gallatin Wildlife Federation comments, 2/12/03, pp. 16-19***
- make standards equal on all users
- grazing vs. recreation use ???
- Noise and pollution have the effect of excluding other users.
- We suggest that an adaptive management approach will determine this on a site-specific basis and provide for the most compatible levels of use and mitigation.
- Activity should be managed on a case-by-case basis; damaged areas should be addressed.
- Large groups of people only bring stress to an environment. With potential problems of litter, weed spreading, fire danger, and other forms of pollution.
- A recent shift from permitted uses to "public use" may result in a degradation of the public land resource as well as have a negative impact on the local economy.

## Question 3: What other, if any, commercial or authorized uses of public land need to be considered?

- All in 2nd paragraph *(of issue statement)*
- Don't add resource uses – already at carrying capacity.
- Ranchers need to be able to have vehicle access to water tanks and salting areas to help keep their livestock scattered which helps control livestock from collecting in certain areas and causing damage to sensitive areas.
- Commercial harvest of conifer encroachment as Christmas trees might be economically feasible.
- Energy production from biomass might create a market for small diameter trees that are harvested as part of thin from below forest health treatments. It is unlikely the DFO will have the funding to do these treatments using service contracts.
- These areas are fairly well taken care of in the examples above. Endangered species wasn't mentioned, but should be considered.
- None.

## *ISSUE #6: Should any areas moving forward as potential Areas of Critical Environmental Concern (ACECs) be designated and what kind of management is needed to protect the values they contain?*

## Question 1: What natural processes and management activities are appropriate/necessary/acceptable to manage each potential ACEC? Why?

**Yes to All**

- All of the areas need to be protected as roadless wildlands.
- ***See Gallatin Wildlife Federation comments, 2/12/03 – pages 6 – 15.***
- I would answer the issue question with an enthusiastic YES, ALL should be designated. But I am in no position to address the specific management activities needed in each of the cases.
    - Management based upon elimination of roads, resource extraction, and other threats to the Areas of Critical Environmental Concern.
    - Most, if not all, the potential ACECs listed in the Digest should be withdrawn from mineral entry and leasing and closed to motorized vehicles off existing, designated roads.

**Management for All**

- control of weeds
- Travel restrictions – seasonally
- State the critical resource associated with the ACEC and use the analysis associated with future activities to determine whether to allow the activity and, if so, how to mitigate
- These vary with the specific habitat needs of the species for which ACECs are identified in the first place. For example, for grizzly bears, secure habitat with a minimum of human disturbance is important as are connected secure habitats along linkage areas that were identified in ACEC nominations. The appropriateness of various management activities depends upon the habitat needs of the species for which the ACEC will be set aside. The best available science should be used to make this determination.
- Resource identification should have priority over all over uses
- Protect those values. These ACECs were nominated. Manage from THERE. Don't permit activities that run afoul of the values.
- Use best available science and regulations – may alleviate some polarization.
- Commercial use should be minimized, as in a wind farm in a nesting area and logging near a wetland.
- These areas should <u>not</u> have logging, mining, oil drilling or additional roads built in them.
- Water tank projects are good to keep livestock scattered. I think permits need to be issued for public use of historic, geological and wildlife sensitive areas plus educating the public to the reasons for the restrictions.

**No to All**

- Think things are really great and solution solution is to change management. If not broke why fix it?
- Appropriate multiple use protects values no need for listing
- No need for additional layer of mgt for ACECs
- Mgt tools already in tool box sufficient
- Of the fourteen (I 4) potential ACEC'S, none require "special management". General management practices already in place sufficiently protect these areas of BLM public land

**Beaverhead Rock**

- Action to preserve: Beaverhead Rock
- compatible uses
- Withdraw from mineral entry and surface occupancy including energy and communication towers/sites.

**Big Sheep Creek Basin**

- Big Sheep Basin Water Case #3208 in 1937
    - documents change in Big Sheep Basin
    - Testimony of historic conditions & change
    - Way more wetlands now than historic
    - *Note: correct water case is #3808 in Beaverhead County Courthouse*
- Continue upstream irrigation to maintain wetlands and associated sensitive plant species per water case 3808.
- Non-motorized use is appropriate in these areas of concern:
- no wheel vehicles

**Block Mountain**

- Interpretation for: Block Mountain
- like to see develop better grazing, ie: fences, waterline How would ACEC affect this?
- compatible uses
- Monument boundaries with large concrete blocks, like those available at LS ReadyMix
- Provide no-cost permits to geologic field schools. Permits would include maps to identify boundaries and help avoid conflicts with co-adjacent landowners and help avoid timing conflicts among the various schools. The permits might also include information to help prevent the spread of noxious weeds

**Blue Lake**

- Action to preserve: Blue Lake
- manage weeds
- Axolotl Lakes: These unique lakes contain not only the rare Axolotl salamander but also the largest existing adfluvial concentration of attic grayling in the lower 48 states. I have documented proof of a high concentration of attic grayling inhabiting the upper lake in exceeding 18 inches in length and weighting over 3 pounds and would challenge you- field staff to identify an area within the physical boundaries of this management plan where an existing adfluvial artic grayling population even remotely equals the Axolotl community
- The classification of the Axolotl Lakes as an "Area of Critical Environmental Concern" for the rare salamander is far too narrow of focus for these lakes. I request your staff revisit this particular area and revise the RMP to include references and more importantly measures to ensure the long term survival of the fishery.
- VC watershed protection concern
- no wheel vehicles

**Centennial Mountains**

- deal with bug kill
- fir encroachment
- Fire protection/mgmt to stop catastrophic fire
- Same for fish protection

- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation. ACEC designation is not necessary
- Encroachment by trees – halt
- Non-motorized use is appropriate in these areas of concern:
- make water and wildlife the priority over livestock grazing.
- Centennial management in concert with Red Rocks Refuge – a participant commented that grazing is allowed on the Refuge.
- other than wilderness do not lock it up. Compatible uses.

**Centennial Sandhills**

- Centennial sand hills have been fenced from grazing. Why now start grazing?
- Protect from human incursion (anything that disturbs nesting grounds)
- encourage OHV use
- Create service contracts that would utilize domestic livestock to prevent the formation of sod and maintain the sand dunes.
- Non-motorized use is appropriate in these areas of concern:
- Centennial management in concert with Red Rocks Refuge – a participant commented that grazing is allowed on the Refuge.
- No wheel vehicles – leave in natural state

**Centennial Valley Wetlands**

- Protect from human incursion (anything that disturbs nesting grounds)
- Non-motorized use is appropriate in these areas of concern:
- Centennial management in concert with Red Rocks Refuge – a participant commented that grazing is allowed on the Refuge.
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation. Continue upstream irrigation to maintain wetlands and associated sensitive plant species. ACEC designation is not necessary
- do not give to FWS – leave in natural state

**Everson Creek**

- Compatible uses.
- maintain current "no entry" status. An ACEC may tend to highlight these resources.

**Ferruginous Hawk Nesting Area**

- Current mgt suffices to protect ferruginous hawk nesting area
- Part of the reason Sage Creek provides habitat for so many "special" species is because of current management. Rather than change that management, maybe the BLM should actually consider results obtained since application of the rest-rotation strategy, and apply it, or variations thereof, to other areas they manage. That can be done with current tools, does not need "special" designation, and is beneficial to a broad spectrum of resources. Perhaps this would be a good opportunity to work with MSU on a new stage of the study using grad students or interns to reestablish photo points, do new inventories, monitor sage grouse, WCT, ferruginous hawks, or whatever was deemed important as data collection***. See other Matador Cattle Co. comments, 3/10/03 – p. 11.***
- Non-motorized use is appropriate in these areas of concern:

- Maintain current management, including Sage Creek Rest Rotation Demonstration area. Monitor sage grouse populations for predation by raptors
- compatible uses

**Lewis & Clark Trail**
- Interpretation for: Lewis & Clark Trail.
- no wheel vehicles.
- The trail as designated does is on highways/county roads. The purpose of the Lewis and Clark Expedition was to ensure the area did not remain unchanged.
- Interagency and private owner cooperative management

**Muddy/Big Sheep Creek**
- Need to continue historic use – it will change
- most have gone in Muddy – time, erosion
- sites destroyed – preserve
- sites in top of muddy –save
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation.
- does change do damage – preserve status quo
- fence off sites?? keep public out
- Continue upstream irrigation to maintain wetlands and associated sensitive plant species. ACEC designation is not necessary
- don't tell (cultural)
- no development

**Thorium City Site**
- Warning for Thorium City Site
- Prioritize and reclaim but do not designate as ACEC
- no wheel vehicles

**Virginia City Historic District**
- Action to preserve: Virginia City Historic District
- signing of historic district
- Dispose of separate tracts via Re & Public Purposes(Recreation and Public Purposes), to MT Heritage Comm. to enable better mgmt of remaining BLM
- Encroachment
- If "old trails" are being considered for use in a historic district as rumored the right of the private landowner can't be emphasized enough! Some "proposed" trails ignore private property.
- Keep livestock out. Prevent erosion. Severely limit off-road and sand dune vehicles or, better yet, keep them out before it's too late.
- compatible uses

**Westslope Cutthroat Trout Habitats**
- Westslope Cutthroat Trout habitats need to be protected from siltation from logging or extractive use degradation.
- MOU dictates management
- Stream barricades for cutthroat trout management to keep them pure
- We suggest that an adaptive management alternative would provide the most appropriate site-specific management and provide for the most compatible levels of use and mitigation.

- ACEC designation is not necessary because WCT are already protected by ESA
- If WCT are a problem, don't catch them. If Sage grouse are a problem, don't shoot them. Perhaps there is no need to blame livestock destroying their habitat. If they do, why didn't the Buffalo destroy their habitat too. Other wild game step in the creek also.

**Other ACEC Nominations**

- Twin Lakes: This drainage contains two lakes at the eastern base of the Continental Divide. The lower lake supports a rare population "ling cod" or "ling fish". I am not entirely sure of the proper name for the species but they do inhabit the lower lake. The upper lake supports a healthy, thriving population of rare native lake trout as well as "Westslope Cutthroat". They were genetically tested and their natural status established through a study conducted by the federal government in 1998. 1 cannot find mention of this area in the RMP and would request this specific area be reclassified as an "Area of Critical Environmental Concern".
- We suggest the B-DNF and BLM manage the public lands within Black Canyon and the north and south forks of Everson Creek as CMAs. We would encourage the FWP to work very closely with the adjacent private land owner (Dragging Y Cattle company) to manage the conservation easement on the downstream sections of these watershed to enhance and protect instream flows, water quantity and quality and fish and wildlife habitat.

**ACEC Process**

- Tim Bozorth explained that the public would have an opportunity to comment on ACEC's that are not on the list at the draft EIS step.
- In 1980 BLM had 30 ACEC nominations that just went away. What happened? Trust is low
- Keep explaining clearly what the process for ACEC nominations was and is, and at what point people still have the opportunity to influence those designations. There is a lot of pent up frustration about the process that was followed to whittle the 63 nominations down to 14 "without broad public comment."
- The ACEC process was extremely frustrating for us. BLM just narrowed it from 63 to 14 and said take it or leave it. We wanted a step where we all got to look at all 63 in map form. Now we want to know WHEN BLM will revisit these. We heard 2006 for revising the Land use plan. Please explain.
- Explain why other areas were not recommended. (Commissioner Coffman tried to talk about the process but participants were not interested in hearing what he had to say). Feared that the Subgroup process cut out their ability to comment on all of the nominations.
- Another example is the nomination for "Sage Grouse Areas." No review completed. Was there insufficient data? Given that this is a species about which we are very concerned, and that no other ACEC's from the list of 14 even mention sage grouse, it seems quite reasonable that we could be overlooking legitimate candidate areas. Critical habitat for this species still needs to be identified. Provisions for expanding the list of ACEC's need to be written into the RMP so that real concerns for such issues as sage grouse habitat or migration corridors, etc. do not get lost simply for a lack of ability to define those areas adequately at this point in time.
- Having participated on the RAC sub-group that considered the ACEC nominations, it was readily apparent that the relevance and importance criterion were so subjective, that almost anything could be made to fit. The question was often asked of the BLM staff present: "Do you currently have tools at your disposal to address the nomination's "area of concern", and the answer in most, if not all cases, was "Yes". Why then, would the area need another level of management? While many of the ACEC nominations met both the relevance and importance criteria the key we finally had to use to make any progress was the word "*substantial significance and values*" under the importance criterion. (BLM 43 CFR Ch. II, 1610.7-2). Also, in determining ACEC's, the

question needs to be asked, "Is this value at risk?", and if it so, how did you arrive at that determination, and what scientific and historical documentation did you use?

- ACECs - is process in place to do these?
    - I.D. needs of each ACEC
    - determine proposed mgmt – existing mgmt
    - comment on these – implement, monitor
- Specific designations to an area (WSA, ACEC, Wild and Scenic River), have the potential to limit management activities and alternatives. These designations, although supposedly meant to protect an area, actually have the opposite effect by limiting management and limiting the tools available to management.

**Wetlands**

- Wetlands constitute a productive and valuable public resource. According to Section 404(b)(1), wetlands considered to perform functions important to the public interest include:
- Wetlands which serve significant natural biological functions, including food chain production, general habitat and nesting, spawning, rearing and resting sites for aquatic or land species;
- Wetlands set aside for study of the aquatic environment or as sanctuaries or refuges;
- Wetlands that destruction or alteration of which would affect detrimentally natural drainage characteristics, sedimentation patterns, salinity distribution, flushing characteristics, current patterns, or other environmental characteristics;
- Wetlands which are significant in shielding other areas from wave action, erosion, or storm damage. Such wetlands are often associated with barrier beaches, islands, reefs and bars;
- Wetlands which serve as valuable storage areas for storm and flood waters;
- Wetlands which are ground water discharge areas that maintain minimum baseflows important to aquatic resources and those which are prime natural recharge areas;
- Wetlands which serve significant water purification functions; and
- Wetlands which are unique in nature or scarce in quantity to the region or local area.

**General Comments**

- We don't need anymore wolves or grizzly bear or lions.
- Grizzly bear, lynx, wolf are FWP's
- One group member had tried to camp in a campground in one of the Areas and could not find a place to pitch a tent that was not covered with cow manure. Felt that it was important for cows to be kept out of campgrounds (fenced out and the gates kept closed).
- Why didn't livestock allotments get the same treatment as ACECs?
- There needed to be a focus question on wilderness recommendations too. There needs to be a focus here.
- Concern about AUM's being predetermined in allotment plans.
- Don't implement "Wildland Urban Interface." This plan destroys vegetation on our public lands to protect adjoining private landowners and subdivisions and fancy homes. They should cut the trees and brush around their homes and buy fire insurance!!

## *ISSUE #7: Should any eligible rivers be recommended as suitable for inclusion in the National Wild and Scenic Rivers system?*

***-- Note: Public support is a consideration in determining WSR suitability. These comments have been sorted but not condensed.—***

### Question 1: Considering the factors above, should any eligible rivers be found suitable and recommended for inclusion in the National Wild and Scenic Rivers system? Why or why not?

**No to All**

- Outstandingly remarkable values no need to change management
- WSR designation will encourage more use, don't want more people
- Afraid of designation of entire river because of lack of trust in gov't.
- No
- All segments – More potential for doing harm by attracting more people/recr – more other *(segments)* than Madison
- No! Read public comments
- I can't see any advantage with this. I think it is okay now. I think sportsmen should help to control noxious weeds by part of license fee going for this.
- Rivers are not BLM's responsibility that's FWPs. Didn't see any BLM at the recent meetings on the River – WHY? What kind of uncoordinated plan are you working on?
- Of the eligible river segments, again, none appear to be suitable for designation as Wild and Scenic Rivers. Private land ownership in the surrounding area and potential to affect historic and existing rights appear to be the determinative factors limiting the Beaverhead River, Big Hole River, and Big Sheep Creek for designation. In addition, designation as Wild and Scenic does nothing to enhance the value and uses of any of the eligible stream reaches. The ability to manage any of these stream reaches along with the potential administrative costs associated with management appear prohibitive.
- Leave segments as is – most are short segments.

**Yes to All**

- Preserve character of when Lewis & Clark here
- A plus for protecting these rivers – fear of development along banks
- Need to be preserverd – protected against ourselves
- If local MT BLM & people in the County had control over river designation & mgmt, that would be OK.
- Yes. All eligible rivers should be included for protection under the National Wild and Scenic Rivers system.
- All eight rivers or river segments should be added to the Wild & Scenic Rivers System. It is important that some rivers be kept free-flowing.
- Yes – they should be included – wild & scenic rivers must be preserved. There are fewer of them left all the time. Fisheries in many rivers are diminishing. This status helps preserve riparian areas as well.
- All eligible W&S rivers should be recommended as suitable for inclusion in the National Wild and Scenic Rivers system, and the determination on moving forward with eligible

- All the eligible rivers should be recommended for designation. We have far too few protected waterways in Montana, the West, and the nation.

**Mixed Recommendations**

- Please recommend the Gallatin, Yellowstone, Jefferson, **Madison, Beaverhead, Big Hole**, Red Rock, Upper Ruby, West Fork of the Madison, West Boulder and Boulder rivers along with **Big Sheep Creek** for designation by Congress as Wild and Scenic Rivers.
- A sub-group of the RAC came to full consensus on all but three segments that had previously been determined as "eligible", that those segments were not considered "suitable"—the only three segments without consensus were the three segments of the Madison River. The sub-group findings were confirmed by a full-consensus vote of the Western Montana RAC. The only segments that should be considered as the RMP moves forward, are those Madison River segments, and of those, only those that have little if any private land holdings along the river
- We include with this reference the Wild and Scenic River comments previously submitted by Beaverhead County

**Impact Analysis**

- More demand & appreciation as population grows
- Designation prohibits building of dams. Designation may draw more people and increase use. Designation made by Congress.
- However, BLM should coordinate with the state to develop the recommendations because the state owns the water.
- I thought the state owns water in Montana. As such, how can BLM recommend inclusion, have congress pass legislation and if the state objects, do such without it being a "taking"?
- May not attract extra use
- Wild and Scenic rivers should be based solely on the factors outlined in Federal law and regulation, and not based on a list that the DFO or other entity has developed to determine whether or not eligible rivers should be included.
- Don't fear designation. People already here & know about it
- Please refer to Beaverhead County's previously submitted WSR comments and made a part of these comments by reference.
- Hard to do management *(with WSR designation)*
- A problem for private landowners with land in these segments. Restrictions! If I had land within a river segement, I would want my land excluded.
- Concern that any designation will mean private lands involved will be "taken" due to pressure for envir. Groups
- WSR designation adds extra layer of complexity
- Big mgmt problem – powerline issue – replacement
- structure replacement? Maintenance?
- Private land issue – incorp
- How does management for WSR affect weed control?

**Big Sheep Creek**

- Big Sheep should not because it is the main thoroughfare thru area. Designation will make road & bridge repair more difficult.
- Big Sheep segment – check
    - impact on irrigation – none
    - no impact on grazing
    - no impact on weed control, etc

    - impact on the road up creek – Big Sheep
    - preserve historic use
    - need water from bottom
    - impact on use of roads, etc.
    - Remove scenic byway
    - less traffic would preserve
    - less use is better for values
- Big Sheep Creek and same sections of the Madison River should be considered – primarily because these areas for the most part aren't surrounded by private property and they have a lot of very unique features.

**Madison River**

- Madison – withdrawal from mineral entry and exchanges along Madison.
- Bear Trap is already in a designated wilderness area. Inclusion in the National Wild and Scenic Rivers system might just bring more people
- Study and discussion of the Madison segments in the Subgroup led me to think that the three segments of the Madison River are all suitable for inclusion in the NWSR system. Each segment had the qualifications for the recommendation it was judged eligible for (whether as scenic, or as wild); the management and land-ownership situation in each case was workable, particularly if BLM would join in co-operative management agreements where private and other public landownership would best be involved; and the designation would not only strengthen the possibility that the funds and personnel (and the attracting of private support and help-activity) would be made available for appropriate management attention, especially including the weed problem in the wilderness segment, but would underline the importance of the river and river-areas in question in the public eye.
- Big Sheep Creek and same sections of the Madison River should be considered – primarily because these areas for the most part aren't surrounded by private property and they have a lot of very unique features.

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**Big Hole River**

- Big Hole – current management adequately protects values
- The Big Hole should be left as is because the Big Hole Watershed Committee is doing an excellent job.

**General Comments:**

- BLM has done a good job of laying out this issue.
- We appreciate the BLM's efforts to simplify and clarify some river issues through a largely map based presentation in the Draft Wild and Scenic River Eligibility Report (BLM 2002(c)).

## Question 2: Are there alternatives other than Wild and Scenic River designation to maintain the outstandingly remarkable values on each eligible river segment? If so, what are they?

**Alternatives to Designation**

- Yes
- Watershed groups
- Local regulations
- Coord w/ fish & game

- Current mgt practices
- Manage for more people.
- Make a deal with landowners (easements) to stop floodplain development and streamside grazing. Create a buffer zone.
- Withdrawal from surface occupancy and mineral entry may be appropriate to consider in further site-specific analysis of these corridors.
- Educate the users of these areas but DO NOT advertise these areas.
- Partner with landowners to protect stretches of river.
- Acquire river segments with land and water conservation funds, TU, DU, and conservation easements.
- The state designates blue ribbon streams.
- Watershed committees are doing a good job and taking in whole river/watersheds.
- River management not BLM's.
- I'm of the belief that outstanding remarkable value is there now because it has not been designated. No change at this time is necessary.
- Call them an ACEC. Then any proposal will assure the identified values are appropriately considered.
- Set up advisory groups for the different river segments because local control seems to work and every river is different. You need to involve recreationists, irrigators, landowners, and fish and wildlife agencies.

**Only Designation**

- If maintaining the outstandingly remarkable values of eligible river segments is the goal, then nothing short of W&S designation will adequately serve to protect those values. Anything less will merely degraded those values.
- There are no alternatives that will do as much to encourage and enable management that will protect and enhance the values in question (let alone other values associated with the landscape in which the river is set but dis-regarded in the eligibility-assessment process). Nor is there any alternative that will do as much to secure funding for management needs and make management attention a priority matter. Designation should raise the priority-level for proper management action.
- No. These rivers deserve protection under the National Wild and Scenic Rivers system. With this designation, they will actually be protected.
- Not that I know of. Designation is important. What else could work?
- This designation has worked well for the clear water rivers of the Ozark Mts. in Missouri.

## *ISSUE #8: How should travel be managed to provide access for recreation, commercial uses, and general enjoyment of the public lands while protecting natural and cultural resources?*

### Question 1: What areas/roads/trails, if any, should be limited to exclusive uses (i.e., ATV only, motorcycle only, hiking only, horseback only, mountain bike only) or a combination of uses (i.e., ATV, motorcycle, and non-motorized)?

**OHV EIS**

- The OHV EIS is a document created by the BLM and the Forest Service with public input from many user groups including motorized vehicle groups and wilderness advocates. The final document is a compromise. While this compromise is not perfect, we urge the BLM to sign it. We urge the BLM for Montana to sign on now instead of allowing one county in another state to hold up this document that took the agency years and endless hours to assemble.

**Travel Map & Signing**

- Sign the roads that are open rather than those that are closed, and designate open roads in the travel maps.
- Stay on public land. Do not designate as open any road or trail on private land.

**Easements & Trades**

- More access points helpful
- Willing seller for easements
- Do no condemn to obtain easements. Obtain easements from willing sellers
- Mitigate the impacts to private landowners that might result for providing access to public lands
- Where BLM acquires easements, will they contribute to county/private weed control along easement?
- Sign better whats there
- Swap lands to make management easier for agencies & private
- Trade lands to block up (consolidate)
- Yes, if there's a lot of BLM land, then they should trade & be fair to the landowners
- Use outside 3rd party appraiser
- Where there are isolated tracts, trade or sell & use $ to acquire other areas or provde incentives to landowners to provide access, etc.

**Fish & Wildlife Values**

- The current travel plan does not effectively address the impacts of increased recreation on wildlife and fish.
- Without first considering the basic ecological needs of healthy vibrant populations of the species that set this area apart, the BLM cannot begin travel planning

**Wilderness & WSAs**

- It has been shown repeatedly that trail grooming that abuts the wilderness boundary often leads to wilderness trespass violations

- There should be no motorized use other than in designated routes in Wilderness Study Areas; old roads should be removed from these areas and the ground rehabilitated.
- Non-motorized only on WSA's throughout the planning area. In others areas where conflicts occur some should be motorized areas and some non-motorized. I am concerned about extensive motorized use.

**Enforcement**

- Patrol existing roads & trails ticketing violators
- Designate certain areas for certain activities, with enforcement
    - Eg: X-C trails shouldn't be snowmobile trails
- State & federal land boundaries need to be signed & monumented so public knows boundaries
- Enforce road closures better
- Too restrictive (of) road closures will encourage civil disobedence. Closures need to have support of general public
- We need enforcement – Big Issue
- shut it off or open it up
- Lack of enforcement of current rules
- (problem) No of enforcement of travel management
- Self-policing – if it doesn't work, close route and take privilege away
- Problem with enforcement.
- Remember, any rules must be enforced and it won't be free.

**Motorized Use**

- The RMP should designate areas where snowmobile use is prohibited.
- Identify critical wildlife winter areas and close to motorized use
- Please protect areas that currently have no roads from drilling, motorized vehicles, and other uses that will damage them. Most of the protected areas in Montana are at high altitude, and there are many plant and animals at lower altitudes that could use protection, too
- Snowmobiles, no – on steep mountain where they will start to slide (although that takes care of the problem!)
- Motorized use should be concentrated in already roaded areas, away from vulnerable habitat.
- As part of the RMP Revision the Dillon Field office should implement the guiding priciple behind the Interagency OHV Plan Amendment. Site specific planning is required to meet the clear requirements of 36CFR 295.2. Clarification is needed in defining motorized users.
- No ATV areas exclusive!! BLM should refrain from using them as well.
- Limit motorized travel to less steep areas where erosion could occur.
- Motorized trail use for handicapped
- ATV's on designated roads and designated routes – never on trails or user created roads.
- Motorized use needs to be synchronized with other uses/actions – stream bank protection, seasonal uses.
- Against cross-country travel off of designated routes.(*Motorized or all uses??)*
- All routes should be designated for motorized travel – closed unless posted as open.
- Vehicle access contributes to the weed problem. The commercial users should acquire a permit to access logging sites, water tanks and salting areas.
- ATV use should be limited to designated routes primarily where travel by regular vehicles is too dangerous. They shouldn't be used in key wildlife habitats or where they interfere with non-motorized uses. If roads are closed to vehicle use this means all of them.

**Non-Motorized Use**

- All trails in the entire study area should be restricted to non-motorized use only. ORVs, ATVs, and other vehicles need to stay on roads where they belong. They should not be allowed to further damage PUBLIC lands.
- Identify large tracts of BLM lands to designate for non-motorized recreational use
- There are millions of acres to hike with no motorized use
- Continental Divide National Scenic Trail – manage for non-motorized use
- I would ask that you took into the possibility of doing an access and trail plan for the Rubies and Blacktails and consider, if you haven't already, getting an easement from Ted Turner for a trail up Bear Trap Creek to link up with the Cowboys Heaven-area trails. That link would provide/great loop hiking and riding opportunities

**Exclusive Use Areas**

- Yes, there should be designated use areas for exclusive uses and some areas split use.
- I would certainly like the idea of biking-only trails.
- Hiking and horseback to steeper areas

**Impact Analysis & Process**

- Keep intact places intact
- Proper mgmt
- Areas of wildlife & birdlife – not good for motorized vehicles, good for quiet trails
- But non motorized vehicle does not necessarily scare wildlife, but there should be some quiet areas for hikers
- See what BLM permittee wants
- Look at the properties of the land
- Local people can come together & figure it out
- Need to revisit every 3 years because so much changes so fast – wildlife levels, commercial demand, industry changes.
- If mines are closed, why have many open roads to them?
- Manage for land first, people second.
- We suggest the respective agencies produce a map based draft road report that illustrate the existing situation such as the BLM did for wild and scenic rivers (BLM 2002(c)). Then specific road conflicts, closures, rehabilitation and/or seasonal management can be identified, discussed and debated. A final report which significantly reduces the amount of roads and road conflicts can then be forwarded for inclusion in the respective land use plan draft EIS.
- All determinations regarding the allocation of lands to ORV use should be determined and driven by resource needs. For example, many species, including grizzly bears and elk, are sensitive to motorized access and land managers which have habitat for these species have adopted motorized access route density standards in order to assure that motorized activities are maintained at an acceptable level for the species.
- The planning team needs to abide by the principles reached by full consensus of the RAC sub-group and confirmed by full consensus of the entire Western Montana RAC. The most important one being that BLM roads without legal access through private lands, should not be shown on public maps
- We believe it would be in the best interest of the land and fiscally responsible for the BLM not to include all current roads without an inventory and assessment of whether they impair the land.
- User created routes are created without appropriate public process or environmental review and most certainly are not "built" to standard.

- Resource allocations will be part of the RMP. Where there are user conflicts, the non-priority use should be curtailed or eliminated. Some combination of uses may be specified in the resource allocation process.
- Alternatively, we would recommend once resource allocations and priorities are made, the Dillon Field Office seek to aggressively educate the public on these allocations to help match users to areas and provide disclosure so that users may have reasonable expectations
- Because of this and because illegally created routes as a matter of policy should not be officially incorporated into the a route system, these illegal routes should be closed and fully restored. Additionally, these routes should only be officially designated when compelling circumstances exist. Compelling circumstances should be clearly defined in the DEIS. We recommend that compelling circumstances be limited to:
    - The route provides recreational opportunities clearly desired by a wide range of public interests not met through existing designated routes and is shown not to be ecologically damaging, and
    - The route will significantly facilitate travel thereby providing significant benefit to the government and the public and is shown not to be ecologically damaging.
- BLM *(needs to)* assume more responsibility for weed control
- restrict travel generally - this is hard
- Education – where to drive, etc
- Eliminate conflicted use
- Limit motorized use
    - impact of erosion
    - transfer of use – closed – go somewhere else
    - weed issue is big
    - Recreational activities – impacts on lands
    - tourist dollars – issue of impact
- Yes, limit at times in areas
- Muddy creek example
    - Limit to certain areas – alternate impact
- issue of snow amount
- apply rules evenly
- All roadless areas over 5,000 acres should be kept free of roads.
- Don't need more
- Recreation driving wildlife onto private lands, ie: Highlands
- Some areas have inadequate access for wildlife management.
- Highlands during hunting rifle season
- But outsiders don't understand our climate or problems
- The BLM must identify:
    - wildlife recourses on the DFO;
    - effects that various types of travel have on those species;
    - all trails and the types of access on those trails, and finally;
    - habitat standards that must be put in place to safeguard that habitat, and make sure those habitat measures are reflected on the ground in the RMP.

## Question 2: Are there any areas that should be designated for intensive OHV use, cross-country vehicle travel, and snowmobile use?

- Preferred that there be No place for intensive OHV use.

- Prefered that there be No place for intensive cross country vehicle travel
- Yes
- Groom snow trails to Fairmont, etc.
- Control uses, etc
- There ARE appropriate areas for motorized activity, but not in wilderness areas.
- Intensive use only on flat areas.
- Generally there is support for some cross country vehicle traffic on public lands, but we do not have any specific recommendations at this time.
- Permit snowmobile use on all BLM land except wilderness study areas and wildlife winter ranges.
- No. Designating area for intensive use only brings intensive problems to those areas.
- Snowmobile uses usually don't interfere with wildlife (after hunting season) or cause resource damage.
- Intensive OHV use only in areas currently used on road or trails only. No cross-country use because of resource degradation/wildlife harassment. Snowmobile use only in non-sensitive areas where wildlife (or skiers) are not harassed – only in currently used areas.
- Yes, to allow more people to visit popular sites. NONE. Detrimental to wildlife especially winter-spring range for big game.
- I doubt it. But they do need a place to play.
- On established roads.
- Of all motorized uses this caused little to no physical damages. Do not get carried away with closures to this use.
- No, where foot-travel is concerned, but yes, where horseback-travel is concerned, given trail-damage from hooves (to say nothing of the pollution from droppings!).
- According to the Digest, 94% of the Dillon RNT area is open either all the time or seasonally to OHVS. I completely disagree with this emphasis. Motorized recreation should be managed as an essentially non-conforming use of public lands, limited to a few, concentrated areas something like motor parks. In other areas, case-by-case and seasonal uses could be allowed for specific reasons without making the areas wide open to motors. For example, permitees and landowners could be allowed to use motor vehicles in specific areas for specific purposes, and in some areas, game retrieval by motorized vehicle could be allowed during part of the hunting season.
- The BLM should work with motorized users to establish "sacrifice areas" on PRIVATE land. PUBLIC land should no longer be abused by intensive motorized invasions.
- Motorized trail use is continually found incompatible with other forms of recreation and therefore effectively precludes other forest users from enjoying their chosen recreational activity. Studies demonstrate that the argument that motorized users share the trails with all other recreationists is inaccurate and irrelevant due to the negative effect they have on all forms of non-motorized recreation.
- In general, from our perspective there are too many roads and too much motorized access, especially during hunting season, in what would otherwise be excellent elk and mule deer security habitat.
- Also, the Montana-Dakotas OHV policy needs to be applied. One of the worst culprits of weed spread, is OHV use. Weed seeds spread through cross-country travel (including snowmobile use) often result in severe weed outbreaks in areas that are not often visited by those concerned with weed control, and consequently are not addressed until someone who cares comes along. Also, when 4-wheelers cross a creek, the water immediately washes out seeds and matter engaged in the undercarriage, and washes it downstream until they eventually lodge—and grow—in riparian areas which are extremely difficult to treat—generally hand pulling only. When travel is confined to roads, it's much easier to find and treat weed outbreaks.

## Question 3: Are there circumstances when non-motorized travel should be limited to designated routes?

- In grizzly bear areas or veg.*(etation)* restoration areas.
- Areas of weed infestation
- Riparian areas
- Upgrade horse trails
- Yes (Bear Trap)
- None that I can think of.
- Yes, when necessary to prevent the spread of noxious weeds, introduced exotics (ie: new zealand mud snails), public safety (ie: avalanches, grizzly bears) and/or pathogen pollution (ie: whirling disease). Additionally, anytime non-motorized uses are not meeting Rangeland Health standards.
- During hunting season or when recreationists need to gain elevation so they can walk downhill to hunt, fish, or whatever.
- Sensitive wildlife habitat.
- Yes – areas of heavy noxious weed stands.
- Where topsoil can be destroyed.
- Yes – wheel vehicles should stay out of riparian, creeks, etc. BUT so should non-motorized use such as horses.
- In areas of crucial wildlife habitat, non-motorized travel should be limited to designated routes.

## Question 4: Are there any areas where snowmobile use is not appropriate? If so, where?

- Proper management - Patrol existing roads & trails ticketing violators
- Designate certain areas for certain activities, with enforcement
    - Eg: X-C trails shouldn't be snowmobile trails
- See what BLM permittee wants
- Look at the properties of the land
- Areas of wildlife & birdlife – not good for motorized vehicles, good for quiet trails
- But non motorized vehicle does not necessarily scare wildlife, but there should be some quiet areas for hikers
- Motorized trail use for handicapped
- Local people can come together & figure it out
- Areas that are difficult to access in the summertime (snowmobiles spread weeds, & this makes weed control more difficult)
- Yes
- User groups – smog noise – provide other opportunities
- Provide areas of compatible use
- Avoid use conflicts
    - Example: hunting vs. logging dilemma
- Not that I know of but beware of the spread of noxious weeds.

**Specific Areas & Conditions**

- Centennial Mtns WSA east of Taylor Mtn because it's right up against highly contested Mt Jefferson area.

- Areas of known bear dens so as not to disturb them
- Defined areas of winter range for elk
- Winter range
- Hunting season
- Wilderness Study Areas. It is illegal.
- Areas with unique features, animals, and sensitive species.
- Centennials where there is BLM access – no motorized, no snowmobiles.
- Roadless areas - have no snowmobiles.
- If an area has sensitive plant habitat or wildlife wintering areas I feel snowmobile use should be restricted.
- Yes, where necessary to prevent the spread of noxious weeds and if snowmobiles are a significant factor with introduced exotics (ie: new zealand mud snails), public safety (ie: avalanches, grizzly bears) and/or pathogen pollution (ie: whirling disease). Additionally, anytime snowmobile use is not meeting Rangeland Health standards.
- Along the Idaho-Montana Border in the Centennial during the hunting season especially, people from Idaho are in violation of the law by chasing elk.
- Sensitive areas/wildlife habitat where air, noise degradation would occur. Ski trails. Dangerous areas.
- Anywhere off the main roads!!
- Wilderness (but law – not by damage assessment). Crucial winter range.
- The BLM must consider whether snowmobile use is or is not appropriate in those areas where:
    - habitat has been identified for species which are sensitive to, or effected by, snowmobile use (such as Lynx or wolverine habitat);
    - in areas with wilderness characteristics that could be affected (roadless or WSAs);
    - or in consideration of adequate numbers, size and location of areas where snowmobiles could displace or overwhelm other uses.
    - There are also areas where cross-country skiing is possible, and conflicts with snowmobile use arise there, not simply regarding tracks but also regarding noise and pollution. Those too should be snowmobile-prohibited areas.
- ALL public lands within the study area should be closed to cross-country snowmobile use. Snowmobiles need to stay on designated roads. Why? Because they crush critters, compact the snow's insulation value to critters, create damaging artificial wildlife transportation corridors, and impair the growth of vital vegetation underneath the snow.

## Question 5: Do we need to acquire easements to provide legal public access? If so, where?

- Provide separate use areas
- Land trades to block up small tracts - encourage this
- Yes Purchase easements. Don't buy land.
- No condemnation
- No.
- As many as possible to maintain reasonable access to public lands. BLM is so far behind in this category that it's shameful – our groups are that ones that have been fighting for public access.
- (Map with hand written comments attached to Focus Question responses) Public Land access maps needed that everyone can afford. Take the money out of the lands program.
- Generally there is support for additional/better access to public, state and forest lands, but we do not have any specific recommendations at this time.

- Where is there not legal access? Perhaps a little walking required will improve the BLM lands for hunting, picnicking, etc.
- Yes – to all public land. Identification and acquisition by BLM. Without condemnation.
    - Exception: isolated 40/80 acre parcel.
- Legal public access is an extremely important issue, but it does not have to be vehicular access.

**Specific Locations**

- Poole Creek ??
- VC Hill – Cow Creek North

## *OTHER ITEMS WE'D LIKE YOUR THOUGHTS ON:*

## Question 1: Do you see BLM acquiring a property or easement or pursuing a withdrawal that would provide a solution to any of the above issues?

**Yes**

- Consolidate to block up for management. Dispose of isolated tracts that are not manageable.
- Obtain easements to large blocks of BLM & FS
- Trade with state land to consolidate.
- Yes. They have done some of this, but really not enough. The BLM land exchanges have not been in the public's best interests in many respects. They are more difficult now because if private property owners can block public lands – then their property is worth much more.
- Yes, to buffer critical areas when needed.

**No**

- Manage what you have for multiple use and not be concerned about acquiring more land. No net gain
- No outright land acquisitions
- No.
- I don't see any value to the BLM owning more land.
- The BLM land pooling and exchange program is a joke. It is all for real estate.
- Appraise our valuable wildlife habitat. It's our public land not a farm. Moratorium needed on the land exchange program.

**Maybe**

- Trades OK but there should be no net gain acreage

**Easements**

- Get easements and interagency cooperation – property taxes are still paid on easements. Federal lands go off tax rolls.
- Easements must be purchased
- Easements negotiated with willing private landowners might provide legal public access to public, forest and state lands. We would recommend any new easements be conditional on BLM to control noxious weeds along those easements.
- BLM should provide access to its land ownership. Exception would be access to isolated 40/80 acre parcels.
- Easements OK

## Question 2: What types of lands do you think BLM should acquire, if any?

**Access**

- None = accesses maybe
- Trades that acquire land to enable access
- Identify and acquire access to landlocked BLM parcels.

- To benefit public access – high in wildlife and recreation values. Been doing a good job with acquisitions.

**Consolidation**

- Dispose of isolated tracts. Acquire larger blocks
- Keep balance, get rid of isolated tracts
- Purchase any in-holdings up for sale or when there is a willing seller
- Block up (consolidate) BLM lands to make management easier
- We see some utility in blocking up lands to facilitate better management of public and private lands.
- Only those that would benefit all users of BLM lands. We feel BLM could benefit all of the public much better if they would attempt to consolidate public lands into one block if it is available, especially Forest Service. Isolated, smaller tracts are harder to manage, or utilize for everyone, the leaseholder and BLM public.
- Acquire land that will enhance BLM ability to manage land it already owns. It is difficult to imagine that all land acquired by BLM in past 10 years has met that criteria. The unspoken reason for some of it has been to prevent development!

**Resource Values**

- Acquire unique visually, ecologically important areas
- Acquire wildlife corridors.
- Migration routes in Centennial for Yellowstone
- Winter range for ungulates
- Valley lands adjacent to mountains, land contiguous to existing BLM
- Any lands bordering BLM land on creeks and rivers.
- We see no urgency in acquiring additional lands because of existing budget and staffing constraints and suitable non-government alternatives exist (ie: Nature Conservancy)
- Working ranches that are for sale.
- Acquire areas with outstanding areas
    - Outstanding areas = intact, scenic values, wildlife values, wildlife corridors, river corridors near existing BLM lands
    - In river corridors – Don't acquire farmlands, keep in farmlands
- Lands for the many endangered species in the Dillon Field Office.
- Sensitive lands, wildlife habitat.
- T10S R15W NE1/4 Sec. 21 – to facilitate rerouting Continental Divide National Scenic Trail as well as providing additional security for Lewis and Clark historic interests near Lemhi Pass.
- Lands (or right-of-way) adjacent to Continental Divide in Monida Pass areas so as to enable CDNST to be moved off Long Creek Road and facilitate resupply logistics for CDNST distance hikers.
- Lands that are very high in recreational values . The BLM lands along the Beaverhead River and the Oxolotal Lakes area are good examples of what can be done.
- High wildlife value lands which acquisition would enhance adjacent BLM lands wildlife characteristics.
- Riverfront land, as in the last few years along the Beaverhead: access to the rivers is important, and FWP is not the only vehicle that could be helpful for that. Land with historical significance (Lewis and Clark associations, for example). Land that expands habitat area (land or water) on current public land.
- We applaud your stated goal on page 30 and 31 of the RMP Digest to consolidate public land holdings and acquire lands with high resource values. We especially favor acquiring the four

parcels now owned by the State of Montana which you have identified as being located adjacent to or near your Centennial Mountains Wilderness Study Area. We encourage you to consider consolidating and acquiring additional State of Montana lands scattered throughout the Centennial Valley.
- I favor acquisition/retention of areas with high natural values such as roadless areas, riparian and wetland habitat, habitat for threatened or sensitive species, winter range, migration corridors, and old growth forest. Also important is to maintain the integrity of areas in and adjacent to ACEC'S, WSA's, and bordering Forest Service or other public lands. If lands are disposed of that have high resource value, some way of encouraging conservation easements would be desirable.

**No**
- No
- No more land
- None.
- Do not acquire migration routes in Centnnial for Yellowstone
- Don't waste wildlife and recreation money on land exchanges.

**Transfer**
- Centennial lowlands to Red Rock Wildlife Refuge

**Other**
- Concerned about private land development.
- Each exchange has to be weighed as to advantage.
- What's the point if BLM allows it to be decimated?

## Question 3: What types of lands do you think BLM should exchange or dispose of, if any?

**Purchase**
- Purchase land around VC from California Creek development
- Purchase Alder Gulch patented mining claims
- in-holdings are priority
- Inholdings

**Disposal**
- Pieces that don't have access regardless of size
- Parcels should go to adjacent landowners
- Prioritize tracts for disposal
- Isolated BLM tracts in order to consolidate other BLM lands.
- Land locked, isolated holdings.
- ¼ sections – no net gain
- Isolated tracts, lands that can be more easily managed by private individuals or public: ie: FS, DFWP, DNRC *(etc.)*
- Isolated tracts
- BLM has a mandate to manage resources on public lands, so any lands that are unmanageable should be exchanged or disposed of as soon as is practical.

- Public lands that are surrounded by private lands and have no legal public access tend to be magnets for development and should be disposed so the general public does not provide a private park for subdivisions.
- Potential transfer to VC tracts to MT Heritage Comm., via Rec & Public Purposes
- Put larger tract together and get 40 acre and 160 acre out of system.
- If lands are only good for grazing I think they should sell them to livestock producers so that it will increase the counties tax base
- Lands that are bordered by private lands should be exchanged for areas that open up use to a larger area that can be used and managed better for all concerned.
- We have been on record as wanting to buy or exchange allotment #30428 for a long time.
- Never – use land adjacent to FS land!! Use truly isolated parcels.
- Thorium City site.
- Parcels that don't border other public lands and not accessible by public rights of way.
- Work with the county governments to find a way to make the transition from public to private land fit with county development policies.

**Impact Analysis**

- look at county tax income
    - tax impacts
    - consider historic practices – preserve these practices
    - economic activites
- Exchange would have to benefit the public, as these are public lands. Why would the public want to give up its lands?

## Question 4: After reading Chapters 1 and 3 and reviewing the No Action/Current Management Alternative Table, do you have any comments that you think should be incorporated into those sections?

**Impacts & Mitigation**

- Consider Back Country Byway impacts
    a) maintenance
    b) traffic, etc
    c) use
    d) funding
    e) muddy impact – elk mobility
- We need a local BLM rep in Lima - person should be for enforcement - Deputy fund
- Fire Dept funds, etc.
- Cost/benefits of weed, sage, etc controls

**Range of Historic**

- Erosion is natural - it happens - Middle fork example
- How do you know its broken!!
- Issue of historic!
- What is the definition of "healthy"? Healthy needs to be defined so that it is generally understood, scientifically based, and legally defensible

**Roadless Areas**

- Questions that were not a part of the above but must be addressed include: protection of remaining roadless lands, the future disposition of oil and gas development on the DFO in fight of other resource concerns, _fisheries and water quality and wilderness recommendations. Each of these issues must be addressed in detail in the RMP revision.
- Concern regarding management of the Centennial Mountains and, in particular, the protection of the wilderness potential of the Ruby Mountains and Axolotl Lakes Wilderness Study Areas.
- We're concerned that we are stuck with little roadless areas. Show us the roads, map them, let us give some input.

**Grazing and/or Allotments**

- Elk issue – rank grass issue
- Grazing is a significant issue that was omitted.
- The whole assumption that "grazing is fixed" somehow went below the radar. The RAC can take some responsibility for this.
- We'd like to understand the range condition, the trends, and what BLM targets are to improve from fair to good.
- Domestic sheep are grazing in bighorn sheep habitat. Similar situations occur between bison and cattle. There is an opportunity here to embrace a whole new vision. Bison migration should equal where elk migrate.
- Page 20 book
    - Big Sheep fence
    - where do you water?
    - won't fix spring? tanks
    - solve this problem
    - who maintains fence?
    - labor – who makes up for it?
    - cost issue?
- Must be affordable
- Show us an allotment map, identify where conflicts exist.
- Don't assume grazing is a natural use.
- There could be a lottery for grazing. Idaho used that idea with some success.
- Let's see an economic study of the true costs of grazing. What public value we are really getting.
- Your "book" does not discuss the High Tensile 'death fences' – U.I.A. 1885, BLM Fence Manual 1741 – (Red Rim case in Wyoming) Wyoming fence guidelines. Death fences – Robb Redford, Roe Allotment, No. Fk Greenhorn, Wilbur Creek, etc.

**Rock Hunting**

- Rock Hunting on BLM land in southwest Montana. I'm writing to request that you continue to allow casual, hobby type of rock hunting to continue in BLM land. Many rock and mineral specimens will weather rapidly, especially fossils therefore preservation is accomplished by collecting and preserving. . . This is a great family activity that many can enjoy and has caused such little disturbance to other nature lovers that even the Sierra Club members do not write letters in newspapers to protest

**Social/Cultural**

- Can we save families
- Maintain historic use

**Economics**

- In the NEPA process BLM has to show economic and social impacts on the county
- Let's look at what one bighorn sheep brought in for money to the county against grazing

**Impact Analysis**

- More understanding from other side
- Ecosystem management is a daunting task. As each component of an ecosystem is integral to its function means that all parts of the ecosystem including species like micro flora and micro fauna, will receive equal consideration when developing desired future conditions, alternatives, objectives, standards and evaluating and mitigating impacts. Ecosystem management would include all species, including humans.
- Congress through the NEPA policy statements have determined that human beings are a species that are a natural part of the ecosystem managed by the Dillon Field Office.
- Unlike public land managers and occasional users, landowners whose livelihood is totally dependent on the health and sustainability of natural resources, are directly accountable for land management decisions, and therefore most try to manage for the best possible balance of conditions. To do otherwise, would mean the resources would not be sustainable, and the landowner would eventually be out of business. The amount of wildlife supported on private lands in the DFO area is a direct testament to the habitat provided by private landowners. The Matador supports several hundred head of antelope, hundreds of mule deer, white tail, and as many as 2000 elk during the winter, as well as an ever increasing population of moose, sage grouse, and numerous other species
- If stable wetlands in the Lima and Ruby reservoirs are important, we would suggest the DFO construct small, contoured, terrace like dams to hold water as the reservoirs are drawn down. Coordination and collaboration with the other agencies and users/managers of these facilities would be required for the Dillon Field Office to implement these changes
- The BLM Dillon Field Office employs a Law Enforcement Officer (LEO) to improve enforcement on public lands. At times the DFO's LEO has been reassigned to "higher" priorities and have resulted in less enforcement on public lands or the Counties picking up the slack.. We would suggest that contracting with the Sheriff's Offices of Madison and Beaverhead Counties would improve response times, and better ensure year around enforcement.
- Under the ecosystem management approach, humans and man's activities should be given consideration as a species and become part of the "natural" framework of disturbance events. Given man is part of the ecosystem; there can be no separation of disturbance into natural or man-caused since humans are part of the natural ecosystem or to distinguish one time period of human history as more or less natural than any other point.
- Given the stated approach to shift to ecosystem management and NEPA policy statements, we ask that the Proposed Action does not include the artificial distinction between "natural and man caused" events.
- The Forest Service, BLM: you are all doing these plan revisions at once. It takes a lot of energy to figure out our access points, what real opportunities we have to influence the outcomes. There should be much better coordination between the Forest Service, Beaverhead-Deerlodge, the BLM and the State to reduce confusion and wasted effort on the part of the public and the agencies themselves.
- Ecosystem management requires an immense scope of information and effort needed to manage resources. Are there adequate funds, staff, materials and support to adequately implement ecosystem management?
- We must remember that we are currently in a drought era and decisions must take that in consideration so that we don't write rules in stone that will be affected by greater moisture in some years down the line. (Flexibility)

- Many of the comments on public access, public easements, range management, wildlife and recreational values, fisheries, soils all should be included.

## Question 5: What did you think of the format, time and location of the public meetings? How could we improve the workshops? *(Comments on the opportunity to submit written comments are also included)*

**Food**

- Let more people know about food *(bold light dinner will be served statement in press release/posters)*
- Food was good
- Liked to be fed at early meeting
- Don't need dinner
- I think the 1/2 hr. dinner time was a waste of time

**Digest Format**

- More graphics and photographss in Digest
- Please, keep it simple. Compare USFS (2002(a)) Draft Analysis of the Management Situation (AMS) for the B-DNF with the BLM's RMP Digest: Description of the Existing Condition and Analysis of the Management Situation (BLM 2002(a)). )). We found the USFS draft AMS much more user friendly and informative.
- Include the name, phone number and email of the specialist under the section headings they wrote. This would help to personalize the document and allow for easier public interactions with the specialists.
- BLM should write a Reader's Digest of nuts and bolts of how relationships work,
- Maps were confusing.
- In hindsight, inclusion of the conservation strategies as appendices to the RMPD or making them available online would have allowed stakeholders to become familiar the specifics of these strategies and better answer these questions.
- History of Grazing Act, and other mandates. (I did point out that while it might not go to the depth desired for this participant that what he had in his hand was the DIGEST!).
- Don't see much chance to change grazing policy – not addressed in Digest

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**Meeting Agenda**

- Like public meeting early to stimulate reading & thought
- Publicize questions ahead of time
- Publicize questions ahead of time
- Most of us came with one issue in mind to provide input about
- Hard to address so many issues.
- Too long – I had to leave early
- Good time – early enough not to be too late at end of meeting
- Liked question format & small facilitated groups
- Identify more specifically agenda, so people would know when actual commenting would start separate from introductions
- Have reference material available or synopsis of other materials available that people could review later if they wanted
- Lippy facilitator

- Too many questions
- Open houses where we have direct access to BLM specialists: most appreciated.
- We had to travel to get to those open houses.
- Separate out comments from meetings by urban and rural, maybe by town
- MCC may have helped get the word out and brought some benefits that way, but we were concerned that this was one more screen in the way of us communicating directly with BLM.
- Should get information out earlier.
- The process including these RMP meetings provide a good opportunity for the public to be involved.
- Public lands are valuable, and we (the public) need to devote time to give input. Anyone can participate who wants to by writing comments or attending meetings.
- Fear or beer gets people out. Make issues more visible in ads. Ask "Do you hunt, fish or recreate in this area?" Use public radio
- People should be allowed to attend only one workshop. The same person giving the same ideas at several workshops could skew the facts.
- People attending should be required to give their residence and area of expertise, including their educational background.
- Check with Wilderness Alliance and Nature Conservancy for fresh ideas.
- They were very good – good interaction if BLM will just implement our concerns.
- There are some ways to avoid shouting matches at public meetings, if that is one of the objectives you have in mind. The format of the recent meetings, like the one I attended in Bozeman, wouldn't prevent "polarization" (unless, of course, as was the case in Bozeman, there is close to universal agreement on the approach BLM should take among the people who attend). Having non-agency people running the meetings is a good idea - it would have helped deflect some of the nastiness if that had been in the air at the Bozeman meeting. It was also good, I thought, to have small group discussions. On the other hand, not having enough agency people there to answer questions was a big flaw in the approach.
- I would suggest that an unstructured open house, with one-on-one discussions between resource people and visitors, is a good format for scoping. It's a good way to get three things accomplished: explain what you're doing and the conditions on the ground; get quality information back, and avoid the nastiness of other formats. It's got to be well-staffed with people who know the resources, and agency people may spend more time answering questions and explaining things than taking comments, but from my experience, the quality of information you get back is quite good, you've advanced the understanding of the people who care about land management, and you've limited the opportunity for public ranting and raving.
- I did not attend any meetings. But frankly, I do not think this step in the process was needed at all; we need to be informed of possibilities and alternatives, of limitations on what BLM can do and mandates as to what it has to do, and to spend more time on consideration of formally-sketched-out alternatives, trying to find adjustments and adaptations at that time. Perhaps if I had gone to a meeting, the question-worksbeet might have made more sense, since as it was, numbers of the questions were unintelligible. In general, it seems as if this process was asking me, mostly in a void, to redesign BLM and set out what I think the agency should be doing-- all in very brief compass, and without myself being knowledgeable about many things which such a re-designer would have to know to do a good job. That seems to me neither constructive nor necessary, and any improvements I would suggest could come out in the scoping phase.
- Thanks for making the effort to come to Harrison. I'm encouraged by the direction I see in your planning process, and I don't feel that too much has been left out.
- Let me start, however, with my concerns about this RMP public comment as I have experienced it so far and how I find aspects of that troubling. At the February 6, 2003 public meeting in Dillon, I was disheartened by the conduct of the break-out group that I sat down to join (I arrived at the

meeting in progress). Our facilitator, Wally Condon (last name?), seemed to me to project a strong bias towards a ranching perspective and against environmental concerns. Those sitting in that group seemed to share that attitude and I had a clear impression that expressing too much concern for the resource was unwelcome (not explicitly, of course, but implicitly). In fact, as I was coming in, someone leaving told me that the pro-ag bias was a bit hard to take. I also sensed a rush to get through the focus questions as the facilitator needed to get back to concerns at his ranch (it was a cold night and he had a cow that was calving). It seems to me that the BLM should provide more neutral facilitation and try to more actively promote respect for a wider range of opinions

- If a light meal is to be provided, we would recommend **bolding** that sentence in the letter/press release. It was also suggested to include an agenda, so people would know when to show up if all they wanted to do was comment. Some participants liked the meal; others simply felt it took additional time. Staff felt the meal had a calming effect.
- Participants noted that the focus questions were extremely difficult. After explaining their purpose, most people understood why they needed to be so precise.
- Most people stated they liked meetings earlier in the comment period, as they didn't usually begin until there was a public meeting or deadline.
- A second and more important concern regards the highly specific nature of the focus questions for the eight defined issues. I believe that questions such as "What natural processes and management activities are appropriate/necessary/acceptable to manage x, y, or z?" can be intimidating to the average citizen who is not trained in the specifics of various resource management techniques. While, on the one hand, I can appreciate the BLM's desire for very specific inputs, this approach discourages more general comments that may not fit well under any of the pre-determined questions. Feeling somewhat daunted myself, I asked the BLM folks at the meeting about making more general comments and was led to believe that if I didn't go into the specific nitty-gritty details about very particular locations, they weren't really that interested in my comments. As a member of the public desiring to offer input on public resources, I found that very disheartening.

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**OK**

- OK - No change
- I think this system worked very well in the Lima area. Thank you.
- We realize that this interim comment period is unusual, and a huge amount of extra work and time for your office personnel. We sincerely appreciate the fact that the BLM is allowing plenty of opportunity for public input, and hope that the extra time and effort will be more than worthwhile in the long run

# MANAGEMENT OF RELEASED WILDERNESS STUDY AREAS

**Motorized & Snowmobile Use**

- Due to the new technological prowess and increased ATV, motorcycle and snowmobile use, we urge the BLM to reconsider the use of all motorized vehicles in WSAs.
- Continued motorized use and increasing use does not allow the BLM to manage under the non-impairment mandate. The cumulative effects of increasing use, widening road and trails, spread of weeds, noise, pollution and reduction of solitude add up to a major reduction of wilderness values.
- Furthermore, snowmobile use, and the accompanying noise and air pollution are on the rise. The resultant noise and air pollution most certainly impairs the wilderness quality of the WSAs.
- In the past, snowmobiles have been viewed as a non-impairing use. Under the nonimpairment criteria set forth by the BLM (page 9, Interim Policy), all uses in the WSAs must be reviewed to determine whether the proposal meets the criteria. Uses found to be impairing will be denied. While snowmobiles may or may not have fit the criteria in the past, this is the right time for the BLM to reconsider this use.
- To be in compliance with the Interim Policy, use in the WSA must be temporary and leave no surface disturbance including vegetative trampling. In low snow conditions the new snow machines trample vegetation, including weeds, and create surface disturbances,
- The Interim management Plan specifically states that all BLM WSAs are to managed using the non-impairment criteria, this applies to the entire 121,919 acres contained in all the WSAS, including the ones not currently recommended for wilderness.
- The Resource Management Plan process is an excellent time to look at restoration and rehabilitation needs within the WSAs. Roads, both illegal and legal could be removed, thus restoring wilderness values and reducing the main conduit for weed spread.

**Management Emphasis**

- Wilderness and wilderness-study areas should be managed differently, and both weeds and permitted activities controlled in a fashion appropriate to the character of the area and to the reasons for its being set apart with the special designations in question.

**Additional Nominations**

- Managing for future potential. We urge the BLM to reconsider its dismissal of the lands that the Montana Wilderness Association submitted to be considered for future wilderness designation. The reason the BLM gave for dismissing these lands was that the adjacent Forest Service roadiess lands were not recommended for wilderness, This reasoning results in giving the decision making power to the Forest Service- The BLM may be served better if the BLM took the lead by managing these lands for wilderness now, instead of waiting for other agencies to act. Waiting will only ensure that the wilderness quality of the lands will be diminished and possibly lost forever.

# COMMENTS BY PAGE/SECTION

***Some individuals went through the RMP Digest and responded to that document, rather than the Focus Questions. Those comments are included and summarized where possible.***

- On Map 6 it appears the sequence of categories of development potential do not flow correctly. Currently the "Development Potential" chart begins with "low" followed by "moderate" and then "very low". I recommend the order be changed to very low, low, moderate or visa versa.
- Page 11 of the Digest indicates that information from the Gravely and Pioneer landscape analysis will be used in development. What is the legal basis for inclusion of this information?
- The report further states the largest city in Madison County is "Ennis" with a 1990 population of 660. The 2000 population of Ennis was over 900. Given this report is dated January, 2003 and therefore after the 2000 census report a more updated population figure is in order. To report such an outdated census figure poses a question as to the overall accuracy of the information contained in the report.
- Technical comments to the RMP Digest*".* ***(Not intended as formal government-to-government consultation)***
  - Page 20: Goal #4 – The Tribes are not favorable to scientific study of cultural resources associated with indigenous people.
  - Page 43: Need to add "Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments", signed by President William Clinton on November 6, 2000.
  - Page 201: 3.5.9. Tribal Treaty Rights – This section was well written. It's refreshing to have a federal agency recognize that treaty rights are important in land management.
  - Page 214: As stated above, the tribes do not favor data recover and/or scientific study of cultural materials
- ***See Gallatin Wildlife Federation comments re: Missing Components, p. 28 and Vegetation, pp. 33-35.***
- P. 50, Historic Transportation Routes: Virginia City—Corrine Wagon Road (Sweet Water, Blacktail Deer Creek, Sage Creek)": Drawing attention to this trail could be detrimental to the resource area, and to the species of concern (sage grouse, WCT, sage stands, ferruginous hawk, etc.) that this RMP is attempting to address. In addition, much of the road crosses private and state lands, and goes right through the yard of at least two private ranches. Access through Little Sage is also partly on private and state lands. Increased traffic would increase sedimentation on streams in the Sage Creek area, and jeopardize the integrity of some indigenous cultural heritage sites. There is already a problem with uncontrolled OHV use that has created a noxious weed problem among other things. If registering this road is required, a possible way to record the road without inviting excess travel would be to place an interpretive sign along I-15 at Snowline or at the other end as a marker and leave it at that.
- P. 52-53, Affected Environment, Fisheries Habitat Location Condition, last sentence; P. 90 & 91,: Riparian Habitat; P. 93, Influences on Riparian Habitat: "Excessive livestock use" on *properly managed* lands is usually isolated, since cattle grazed "long-term" in an area have learned where the crossings are, and most will stand in line to cross there. Those crossings are typically naturally shallow and wide, with gravel/rock bottoms since they don't like silty areas that tend to be narrow and boggy. When no good natural crossing exists, cattle are more than happy to cross on a stable crossing such as a bridge, culvert, or armored crossing, which are items that can be negotiated in an AMP.
- Findings from other studies such as the attached study from MSU (*Monitoring Streambank Stability: Grazing Impacts or Stream Variability?*; by Rhodes, Marlow, Sherwood) indicate that geology has more to do with stream condition than management. Geology is an important factor that needs to be considered when determining condition.

- Also, we question the statement that only 18% of riparian areas in the DFO rate out at "proper functioning condition". The natural (i.e. "proper") dynamics of stream function dictate that there will always be a certain amount of tearing down and building up even without human or cattle interference. (i.e. excess sedimentation due to wildfire or beaver dam washouts, ice breaking off taking part of the bank with it, historical stream bank trampling and banks stripped of vegetation through intensive bison grazing, etc.). That would indicate that *absence* of so-called "dysfunctional" areas is unnatural, and improper, and a goal attainable only through totally unnatural manmade manipulation, such as "streams" in Busch Gardens, i.e. *"Management objectives may establish a desired future condition that extends beyond basic proper functioning condition."(* P.91, RMP Digest) Some common sense is needed here.
- P. 53, Factors Affecting fisheries Habitat and Production, first paragraph; P. 93, Influences on Riparian Habitat; P. 101, Conifer Forest Habitat, right column: A major factor that seems to be missing in this section, is that of encroachment. Encroachment consumes a great deal of water (dewaters streams and riparian areas), reduces ground cover (increases sedimentation through lack of adequate filtration), invites wildfire (introduces more sedimentation in one year than grazing does in probably 50, severely degrades air and water quality), and shrinks riparian areas (contributes to impaired or dysfunctional riparian areas). To place more emphasis on old mining activities and current grazing management is misleading and a waste of time and resources as long as the larger problems of encroachment and timber stand management are not addressed.
- P. 53, Sport Fisheries: Bear Creek is NOT a "sport fishery", and certainly does not have "high fishing values" as far as sport fishing is concerned.
- P. 58, (Paleontology) col. 2, para. 3: *See first comment about wagon road.* As long as the BLM is unable to enforce, either financially or manpower wise, road restrictions in remote, open areas, or maintain a presence there, highlighting this type of site is an open invitation to site degradation, misuse and abuse. We hope that this is just a reference to inventory. We are adamantly opposed to advertising these types of resources. *Also see P. 62, WCT comment*
- P. 60, last para., P. 61, (Soils) Management Concerns; P. 90 & 91, Riparian Habitat; P. 93, Influences on Riparian Habitat: *"Overland flow and sediment transport into streams can be pronounced during intense precipitation events or during periods of severe runoff or snowmelt events. In areas of limited vegetative cover, this transport is exacerbated." (RMP Digest, January 2003)*
- This is a very important statement, and one that needs serious consideration when considering grazing restrictions and long-term riparian and range management. There are excellent examples in Beaverhead County that demonstrate the benefits of properly managed grazing systems that can actually enhance natural vegetative cover, and provide excellent filtration during periods of severe runoff. Easily documentable examples can be seen at the Basin Creek exclosure in the Sage Creek R/R Demonstration Area (Exhibit 1); and, on the EF Blacktail Game Range in contrast to the neighboring private Matador Cattle Company meadows in the Landon Fields (Exhibits 2 & 2A)
- **Exhibit 1:**Approximately 2000 head of cattle have grazed this unit in a 3-pasture rest/rotation system since 1976. The dark green stripe across the top one-third of the photo is Basin Creek on BLM in the DFO. In this system, pastures get two seasons of back-to-back growing season rest. Contrast of health and vigor is readily apparent.(S. Marxer photo, 8/11/98) **See photo exhibits in Matador comments. Exhibit 2, Exhibit 2A**
- P. 62, BLM Sensitive Species, Westslope Cutthroat Trout; P. 90 & 91, Riparian Habitat; P. 93, Influences on Riparian Habitat: As recognized by the BLM, hybridization and competition are two of the greatest threats to WCT, as well as habitat degradation. Some of the worst WCT degradation we have witnessed on WCT streams is related to beaver activity, encroachment, and humans. Our experience with WCT on the Sage Creek Rest-Rotation area is that the Basin Creek WCT fishery has thrived under the grazing system in place since the mid-70's. The area in Exhibit 1 is part of that fishery, and you will notice the only fence is the exclosure. George Ochenski, an avid fisherman and environmental lobbyist who has lobbied for Trout Unlimited and the Montana Environmental

Information Center, and who is the author of Montana's "Future Fisheries Act of 1995" had this to say when touring the Matador and Basin Creek in 1998: *"Huge, native cutthroat in such tiny water is outstanding"...The presence of such fish indicates an "extremely healthy ecosystem."…* (Range magazine, Spring 1999, *"Montana's Matador"*, by Tom Daubert)

- Sadly, the following year, 1999, when we took a film crew to the area to film the fish and fishery, something had happened to the fish. We don't know what happened, but it was a drought year with low water flow combined with a cold winter, and it's possible there was a lot of winterkill. Other factors that may have had an effect could be a whole series of new beaver dams, or, overzealous fishermen, since tracks indicated that someone had been camped there for a period of time. In that remote location, people could camp there and do anything they want for two weeks or more without ever being seen. *(Ref. P.58, Paleontology comment)*
- What we recommend is that BLM stick to its policy of providing "minimum level of protection" as far as grazing is concerned. However, in areas where WCT are located, a well-planned grazing system should be implemented, preferably 3-pasture rest-rotation to improve forage cover and bank armoring, and decrease sedimentation from runoff (including fire). Also, encroachment should be addressed to help prevent the dewatering of streams and lack of adequate filtration. Some of the pure species of WCT have their headwaters in the Centennial Mountains. The most imminent threat to them right now, aside from continued drought, is wildfire due to a tremendous fuel load from bug-killed trees and lack of timber management for at least 40 or 50 years. Any management that severely curtails consumptive use, (i.e. forage and timber management) in the name of "protection" for the Centennial Mountains, will do more harm than good.
- P. 64, BLM Sensitive Species, Threatened and Endangered Plants, Special Status Plants: *"No plants in Montana are currently listed endangered, while three plants are listed as threatened. None of the listed plants are known from BLM lands in Montana…"(RMP Digest, January 2003)*
- We absolutely agree that noxious weed control is essential, and is reaching a critical point. *See the comments from private landowners who control land in the southern portion of the DFO on the Travel Map for Blacktail, Sage Creek, and Centennial*
- Since there are so few known "sensitive" plants, those that may need special protection could easily be protected with pyramid type wire cages—including plants on ridge tops where mineral or supplement is placed. Cages would also provide a good monitoring point. However, to use the limited information and input referenced, to control the management of the three areas mentioned on the basis of "sensitive plants", would create an imbalance in the overall ecology of those areas. It could also place an undue burden on those who depend on natural resources for an important part of their livelihood, and consequently the economies of the communities served.
- We find it interesting that on page 85 of the RMP Digest, the statement is made that *"...the Beaverhead Mountains Section has received more sampling inventory than anywhere else in the state..."* This is a large state. Could it be that this section is being targeted for "special management" by special interests? If the rest of the state were sampled as heavily as the Beaverhead, it is quite likely that larger populations of these "sensitive" plants would be found. The proximity of Yellowstone National Park, Red Rock Lakes National Wildlife Refuge, EF Blacktail Game Range, and Centennial and Blacktail Mountains WSA's, etc., ensures that there is an abundance of protected land in place in the southern end of the DFO already. FLPMA provides for management of public lands on a multiple-use basis, which is strongly emphasized by the current administration. Other Acts providing for rangeland use and improvement are the Taylor Grazing Act of 1934, and the Public Rangelands Improvement Act of 1978.
- P. 67, BLM Sensitive Species…Riparian areas and wetlands including alkaline and moist meadows: As long as there is periodic disturbance along with periodic rest such as occurs under a rest-rotation grazing system, those species should not need special protection. Our experience in the Long Creek Study (in the Centennial) was that those "sensitive species" plants that were protected by fencing them out, nearly disappeared, while those left in the grazing system maintained.

- P. 67, Special Status Species-Wildlife, Affected Environment, last para.: Those management actions such as Montana's Sage Grouse plan that have been arrived at using the full array of science available, and that have been developed with all interested parties at the table, should be incorporated into BLM planning documents.
- P. 82, Insects and Disease: The Protection Act of September 20, 1922 (16 U.S.C. 59) authorizes the protection and preservation of timber on public lands from fire and bug kill, etc. There has to be a balance. By law, BLM lands are to be managed for multiple use. By attempting to preserve the forests, it will only be a matter of time before they will be harvested in a much less environmentally friendly manner (wildfire) than if the BLM managed them in a way that could benefit all involved—species, habitat, water quality, air quality, economy, recreation, and, neighbors. The fuel load in the Centennial Mountains is like a box of stick matches just waiting to be lit. As neighbors, we feel the BLM needs to be responsible to manage public lands in a way that will not endanger ours, or cost the public millions of dollars trying to put out fires that could have been managed. That also applies to weed control.
- Several laws dealing with water and air quality exist, and Executive Order 11514, Protection and Enhancement of Environmental Quality, March 5, 1970 (35 FR 4247), ESA, NEPA, and FLPMA should all be considered here, since *in*action should be considered an action where the decision is a deliberate choice made concerning well-known conditions: extended drought, bug-kill, dangerous levels of fuel loads, two years of historically severe wildfire, and noxious weed invasion.
- P. 91, Riparian Habitat, Function and Condition; P. 93, Influences on Riparian Habitat: Attached are two pertinent scientific papers from a recent published study carried out in the Centennial Valley on a FS allotment (1990 – 1994): *"Monitoring Streambank Stability: Grazing Impacts or Stream Variability?"*, and *"Historical Trends in Willow Cover Along Streams in a Southwestern Montana Cattle Allotment"* which support rest-rotation grazing. This study played a large part in the settlement of the Beaverhead Forest lawsuit, and we are curious as to why this locally researched and published scientific study was not referenced during the planning stages of this RMP? We also have a complete inventory of monitoring slides taken over the duration of the study documenting several riparian as well as upland sites. The largest impacts occurred during the 35 months the allotment was rested, and were a direct result of natural events. Other remarks are incorporated into previous sections.
- P. 93, Influences on Riparian Habitat: There is not a huge amount of water diverted for private irrigation in the Centennial Valley since there are no crops. There is probably more private *pond* diversion for personal use. See previous riparian related comments concerning dewatering. Currently, the biggest problem is lack of adequate mountain snowpack for several consecutive years, and an extended drought combined with conifer encroachment, and an increasing movement toward monocultures of conifers in headwaters of many streams.
- P. 94, Visual Resource Management Class Assignments, P. 158, Social and Economic Conditions:*" The prevalence of grazing in the planning area and the open spaces afforded by an agricultural economy have prevented major change to date" (p. 94, Resource Digest)*
- This is a critical statement that land managers need to bear in mind when determining land use restrictions. The low income of the agriculture sector combined with high real estate value, should be very alarming to BLM and public who obtain enormous value from the huge tracts of private ranchland interspersed with, and bordering BLM. A high percentage of critical winter habitat is located on those private lands, as well as year-round habitat for some species. Most private land managers who depend on natural resources for their primary source of income, manage those lands in a way that is also beneficial to wildlife. In addition, they do a much better job of controlling noxious weeds on their own land as well as on neighboring public lands. When manipulating management to favor one species over another, care needs to be taken that other species are not put at risk, since the ecological system is then out of balance. The most threatened species in the DFO, are ranchers who are entirely dependent on sustainable resources—private and federal--to stay in business.

- BLM—and wildlife--are every bit as much dependent on those private lands as the ranchers are on public lands. To apply excessive restrictions which result in decreased grazing of rangeland, is to limit an already poor income, which forces many ranchers to begin fragmenting their land—or, selling out completely, and moving to a less restrictive environment. Since ranchers are "land rich and cash poor" the buyer in most cases is a developer, or another entity who is not aware of "best practices" for land management, and does not practice weed control.
- he best possible way to manage BLM resources in this field office, is to work in partnership with local jurisdictions, ranchers, and communities in order to best preserve the open space and unfragmented landscape currently present.
- It should be noted here that certain Class IV visual objectives are a primary draw for many visitors to this area. Since 1988 we have hosted World Wide Country Tours "Big Sky Tour" in the Centennial Valley or up the Blacktail, and have hosted anywhere from 10 busloads (avg. 40 passengers/bus) to 5 busloads of visitors per summer from all over the United States. Without exception, one of the main reasons each visitor chose this particular tour was for the opportunity to visit a large ranch and meet genuine working cowboys in a Class II or III setting.
- P. 101, Conifer Forest Habitat, right column: Many of the statements on this page seem to directly contradict statements made on P. 92, and P. 147 of the RMP Digest, and encourage unnatural manipulation of encroachment for the benefit of wildlife at the expense of other resource conditions. Since *"Riparian habitats receive a disproportionate amount of wildlife use with approximately 75% of all wildlife species utilizing riparian areas for at least some portion of their annual life cycle…" (RMP Digest, P. 90),* it seems irresponsible to increase coniferous habitat at the expense of riparian areas and natural meadows. See previous comments dealing with encroachment.
- P. 102, Habitats of Concern, para. 2: (see comment for P. 52, 53,): There is a lot of presumption and theory in this paragraph. Improving natural communities is a good goal, and should always be the basis for sound management. However goals need to be realistic, based on sound science, and be achieved by whatever tools can bring about the best results. Holding resource users to higher than "proper" standards, can be unrealistic, and in many cases unachievable due to natural conditions, geology, weather, and a number of other factors. It can also be counter productive, and create worse problems in the long term. Unrealistic, subjectively applied standards are also seen by "user" groups as a tool used to eliminate particular compatible—even necessary--uses in order to placate demands from "special" interests. *"Potential…recovery…would increase." (para. 2, last sentence)* is a theory only—a theory that has more than one way it could be applied.
- Para. 4: This is a pretty strong statement, considering BLM doesn't have the manpower to monitor their own land adequately, let alone the permission or manpower to monitor private lands. Very few, if any, sage habitats are being converted to farmland in Beaverhead County, and to say that existing sage-habitats are not "*…being managed in a fashion that may provide for many sagebrush-dependent wildlife needs…"* is an insult to many private large landowners. And even in cases where that may be true, J.E. Mitchell, quoted in the Utah study, remarks that: *"While sage grouse populations may not thrive on poorly managed rangelands, they generally vanish when working ranches become ranchettes."*
- Unlike public land managers and occasional users, landowners whose livelihood is totally dependent on the health and sustainability of natural resources, are directly accountable for land management decisions, and therefore most try to manage for the best possible balance of conditions. To do otherwise, would mean the resources would not be sustainable, and the landowner would eventually be out of business. The amount of wildlife supported on private lands in the DFO area is a direct testament to the habitat provided by private landowners. The Matador supports several hundred head of antelope, hundreds of mule deer, white tail, and as many as 2000 elk during the winter, as well as an ever increasing population of moose, sage grouse, and numerous other species.
- P. 103, Para 3: concerning wetland conditions, see comment for P. 93, Influences on Riparian Habitat

- P. 104, Management concerns: The statement that *"Habitat requirements cannot be met everywhere for all species,"* is correct. We have found that a balanced, multiple-use management technique has been the most successful in maintaining and improving habitats and conditions across-the-board. Too much "habitat manipulation" can ultimately result in an artificial, unbalanced habitat that too often results in monocultures with lack of variety of species and age class, or extremes which create a whole new set of problems.
- P. 105, Elk, Mule Deer, Antelope, right column: We disagree with the statement that the Centennial Valley is *"...not meeting the seasonal need of these species as a result of past sagebrush burning on all ownerships, competing livestock use, or habitat fragmentation."*
- If in fact this statement were true, a big part of the problem would be attributable to game management that has allowed elk populations to exceed plan objectives. Another problem is non-management of timber stands in the Centennial Mountains, which has severely decreased or eliminated forage in small meadows that have disappeared entirely due to encroachment.
- In the areas we logged on the south side of the Centennial, if we wanted to find elk, the best place to look was in small revegetated clearings where there was new, fresh grass growth. In both logged areas, those openings were favorites for elk calving and summering areas. In contrast, there are still old meadows up on top with nice, tall grass that get very little use, simply because the forage is old and decadent, and elk prefer to graze where cattle have taken off the old growth, and new growth has started--an observation that has been proven many times on the Sage Creek Rest Rotation area. Without fail, the elk go first to the unit that was grazed earliest in the growing season, and last, to the unit that was rested.
- P. 106, Bighorn Sheep and Mountain Goat: No additional special management should be considered for these species outside of tools currently available. In spite of special management and what is considered suitable habitat, populations are being reestablished and maintained artificially. There are other places in Montana where Mountain Goat and Bighorn Sheep maintain naturally.
- P. 107, Sage Grouse: Although the need to emphasize sage grouse management is a requirement, caution needs to be used before adopting broad sweeping regulations. There are too many unknowns, which the BLM is well aware of: *"...habitat quality and composition have not been adequately investigated."..." Large areas of sagebrush appear to provide suitable habitat for sage grouse but are unoccupied."..."Brood rearing habitats have not been adequately determined." (RMP Digest, p. 107, Jan. 2003)*
- Under paragraph one, severely decreased sheep grazing is a historical factor that has been overlooked. Historically, peak sage grouse numbers in Beaverhead County coincided with peak sheep numbers and high predator control. Part of the reason sage grouse thrive in sheep habitats is because sheep prefer forbs, and their grazing habits are conducive to forb production. How does the BLM know that the peak population of grouse during the peak of the sheep grazing in the Centennial—wasn't unnaturally high, and based on an unnaturally high incidence of forb production and an unnaturally low population of ground predators and raptors?
- The spring of 2002, an examination we did of approximately 200 sq. yds. of a sage grouse area in Little Sage, revealed another interesting thing about the relationship of cattle and sage grouse that we've never seen considered in any research documentation. Every single cow pie, without exception, had been flipped over and dissected by grouse. An interesting observation since beetles constitute a large part of their diet.
- Prescriptive fire is an important tool that seems to be being ruled out-- but according to the study done in Utah, *"Hot, August wildfire burns in Wyoming sage wintering areas appeared detrimental, while cool-season controlled burns in summering areas appeared beneficial to grouse." (Sage Grouse Ecology and Management in Northern Utah Sagebrush-Steppe, Synopsis by Rich Danvir, 2002 –copy in DFO).* Another interesting quote from the same synopsis is that *"Mean brood sizes increased as forb availability increased due to burning and planting."*

- The research also discovered that 65% of grouse examined post-mortem had been predated by raptors, primarily Golden Eagle, and goes on to state that coyotes may have aided grouse survival by reducing prey abundance and eagle production.
- As for grazing, the Synopsis states: *"Time-controlled grazing practices at DLL (Deseret) since 1980 have increased herbaceous cover on rangelands, and slowed the rate of sagebrush increase. Grazing exclosure data suggest … excluding livestock increased shrub production, reduced forb production, and failed to increase plant species diversity…Results of this study suggest livestock grazing and brush management techniques can be used to enhance sagebrush habitats for sage grouse if used wisely."*
- In some cases, what some would consider detrimental to sage grouse, has been found in research to actually be beneficial. For example, *"Wyoming sagebrush vigor declined in areas receiving winter browsing by elk and pronghorn, but improved in areas where grasses were purposely overgrazed by cattle." (Sage Grouse Ecology and Management in Northern Utah Sagebrush-Steppe, Synopsis by Rich Danvir, 2002 –copy in DFO).*
- To add to the controversy over desirable sage brush stands, Gary N. Back, Principal Ecologist, SRK Consulting, Elko, Nevada (correspondence attached) says his *"…observations indicate that the shrub structure is at least as important…"* as shrub cover and screening cover, saying a *"…low, spreading shrub (umbrella shape, without the handle) provides better cover for a nest site than a tall shrub with the canopy elevated off the ground (toad stool or mushroom shaped) The low growing umbrella-shaped shrub only occurs where the plants have space to spread—i.e., early successional stages following disturbance…Once a stand is dominated by the mushroom-shaped shrubs, stubble height is not an issue—the structure is not there to provide the nest site. Currently, much of our rangeland that still has sagebrush is dominated by plants that are 40+ years old (i.e., mushroom shaped). However, if we don't recognize the structural component of nesting habitat, then groups will start to manage for stubble height in stands dominated by the mushroom-shaped shrubs. This is not likely to provide a significant benefit to nest success…"*
- Here again, a three-pasture rest-rotation could be beneficial. Rather than apply an unproven management technique area-wide, some areas should be treated with different prescriptions, and consider using Sage Creek as a "control" since the management has followed a specific prescription since 1975 and contains sage grouse leks, but not the highest concentration in the DFO.
- Background
    - Any County participating on an agency ID Team as a NEPA Cooperator is something unfamiliar to most stakeholders. We believe it would be helpful to stakeholders if this was more thoroughly explained in the upcoming DEIS and the Counties will prepare an initial draft of this explanation for inclusion in the DEIS. In the near term, we would suggest using capitalization to help distinguish NEPA/FLPMA Coordination, Consultation, Cooperation and Collaboration from the non-NEPA/FLPMA usage.
    - Paragraph 4: We would suggest adding "and jurisdiction" after "government with special expertise.
- 1.3.2 Land Ownership and Administration in the Planning Area
    - We would suggest directly notifying the land managers of split estates so they may participate in the Dillon Field Office's RMP process and/or consider the RMP in their planning processes. We also suggest that a discussion of how the Resource Management Plan alternatives will impact surface rights and surface management would be appropriate in the Draft Environmental Impact Statement.
- 1.4.3 Issues Addressed
    - Issue 3: Coordination with state and private land managers is very important, as management of private lands affects public lands, and public land management affects private lands.
    - The RMP should plan for assessment and mitigation of impacts to private lands, state and local governments, affected stakeholders in and around the planning area (which is the other

side of the agency observations that private lands and certain private rights such as water rights and rights of way make management of agency land and resources more difficult). We encourage the BLM Dillon Field Office to be a "good neighbor".
    - The Counties, as NEPA Cooperating Agencies, look forward to assisting the BLM Dillon Field Office in development of these provisions and objectives and recognize that, as the NEPA Lead Agency, the BLM Dillon Field Office has the ultimate responsibility for the content of the Environmental Impact Statement.
- 1.5 Planning Criteria and Legislative Constraints
    - Paragraph 3, Bullet 1: A plain reading of the FLPMA definitions include "the various renewable resources of the public lands" and "including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values;" In addition to grazing and timber production, there are a variety of other important renewable resources that should be managed for "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output" including big game hiding and security cover, high canopy cover sagebrush for sage grouse, watershed yield, recreation and solitude.
    - Paragraph 3, Bullet 8: This bullet discusses the use of the Gravelly and Pioneer Mountains Landscape Analyses. It is the Counties understanding that the Gravelly and Pioneer Mountain Landscape Analyses were developed as using pre-settlement 1860 landscape as the target or goal. If the RMP chooses a different target or goal, these will have very limited applicability.
    - Additionally, the Counties are concerned that these two Landscape Analyses are not compliant with FACA (Federal Advisory Committee Act). The GSA document "When FACA Is And Is Not Applicable To Interactions With The Private Sector" is included under Tab #6. The GSA 2001 FACA Final Rule has also been included under Tab #6. The portions of the Pioneer Mountain and Gravelly Landscape Analyses that appear problematic to the Counties are quoted at Tab #7.
    - According to the GSA document, "When FACA Is And Is Not Applicable To Interactions With The Private Sector" and Mr. Charles Howton, GSA Committee Management Secretariat in Washington D.C., the rule of thumb is FACA applies any time an agency is requesting or expecting a group decision or consensus from a group that is not entirely made up of government employees. The standard operating procedure is for the agency to contact their solicitor or counsel to obtain a letter reviewing the interaction process prior to the agency engaging in activities that might violate FACA. Many times the solicitor or counsel will contact the GSA FACA Committee Management Secretariat for additional guidance. Mr. Howton can be contacted by phone at (202) 273-3561 or by email at charles.howton@gsa.gov
    - The Counties have three main legal concerns regarding the use of the Pioneer Mountain Landscape Analysis and the Gravelly Landscape Analysis:
        - If the Landscape Analyses were not FACA compliant, would their utilization legally flaw the agency's ongoing NEPA planning processes.
        - Since they are referenced as agency documents (USFS and BLM 1998) do they comply with all agency requirements?
        - If the Landscape Analyses are public collaborative works and not agency documents, can they legally be given anything more than "due consideration" under NEPA as a public comment?
    - Paragraph 3, Bullet 13, 14 & 15: We note that both County and State plans meet the FLPMA description as formally adopted and approved plans subject to the FLPMA requirement of consistency to the extent possible as noted in Bullet 15.
    - Paragraph 3, Bullet 18: NEPA requires that alternatives be realistic and achievable, including constraints on budgets and staffing. We concur with the decision that the Resource

Management Plan recognize current funding levels and develop desired future conditions and objectives that can realistically be achieved at these levels. If all alternatives are realistic choices, then the difference between effects will not be dramatic, but will require close scrutiny to select an appropriate course of action that addresses all multiple use and sustainability interests.

- We ask that within the RMP, funding sources are recognized and linked to or committed to objectives to insure action or movement toward accomplishment of objectives. We see the Resource Management Plan as a vehicle to remove the obstacle represented by the statement, "The BLM Dillon Field Office planned to address that objective, but the Dillon Field Office did not receive the funding to do so."

- 1.7 Related Plans
  - Paragraph 2: We would suggest that management of private lands immediately adjacent to public lands be considered to the extent possible in this process.
- 3.1.2 Cultural Resources
  - Historic Period Overview
    - Paragraph 4: Indigenous people began large-scale cattle ranching in Montana in the Beaverhead River valley around 1850 and prior to the gold rush and settlement period of 1860
  - Cultural Resources Condition and Trend
    - Paragraph 1: One additional danger to cultural resources is the natural meandering of streams and rivers.
  - Historic Homesteading/Ranching
    - Because the Ney Homestead values are of regional or natinal importance, their location along Interstate 15 and the Beaverhead River are advantageous to public interpretation, we would suggest allocating this resource to Traditional Use as defined in Appendix C of the RMP Digest.
- 3.1.3 Fisheries
    - We would suggest changing fisheries to “Aquatic Ecosystems” or “Aquatic Habitats.
  - Fisheries Population Distribution, Size, Trend and Management
    - A total of 18 species are discussed under fisheries. Absent from either the Fisheries section or the rest of the RMP Digest is a thorough discussion of aquatic ecosystems.
  - Fisheries Habitat Location and Condition
    - It is not clear to the reader exactly what the BLM Dillon Field Office is managing. The text of this section discusses streams and fish, but the State of Montana owns the water, fish and the streambed. Is it the intent of the BLM Dillon Field Office to manage the aquatic streambed vegetation, or the adjoining riparian areas similar to the proposed Westslope Cutthroat Trout ACEC?
    - Paragraph 1: The discussion on stream condition and trend was done without any references. Does the DFO have sufficient, long term, credible biological monitoring data to make these broad statements and generalizations? Does the biological monitoring process have sufficient resolution to differentiate separate activities, use levels, the climate and determine each activity's cause/effect relationships and how those activities impact on public land resources?
    - ***A description of sufficient, long term, credible biological monitoring data is found on page 9 of Madison and Beaverhead County Comments.***
    - The last sentence of this paragraph states, “On many streams, bank trampling and width-to-depth ratios are often excessive from long-term livestock use.” What appears to be the root cause of stream condition problems is not livestock grazing, but livestock grazing management. In the DFO livestock grazing authority and management are the responsibility of the professional land managers that develop Allotment Management Plans. If livestock grazing management is contributing to

the decline in condition of streams in the DFO, we would suggest the RMP implement innovative and/or superior grazing management practices.

- Factors Affecting Fisheries Habitat and Production
  - Sport Fisheries
    - These sections appear contradictory, as one section discusses the "negative" effects on certain streams and rivers and the next section describes these same streams as "blue ribbon". "(R)iparian areas that are in less than proper functioning condition" are described as limiting fishery habitat. For example, a 3.22 mile segment of the Beaverhead River fishery values were determined to possess Outstandingly Remarkable Values on a regional or national scale with none of the 2.95 miles of the DFO segment in proper functioning condition.
- 3.1.6 Soils
  - Management Concerns
    - We would suggest adding the effects of severe fire to the list of management concerns. Soil sterilization and loss of organic matter can be caused by intense fire events.
- 3.1.8 Special Status Species – Fish
  - Montana Arctic Grayling (Fluvial Population)
    - Paragraph 2: We would suggest an additional source of stream dewatering to be the additional water usage of conifers encroaching into grasslands and the conversion of more open, single storied forests into dense, multi-storied stands. It is likely this reduced watershed yield is also affecting Westslope Cutthroat Trout.
    - Irrigation does affect the hydrologic regime compared to pre-settlement conditions, but the RMP Digest offers no explanation as to why one hydrologic regime is more or less "natural" than another since man is a natural part of the ecosystem.
- 3.1.9 Special Status Species – Plants
  - Sagebrush Steppe and Grasslands
    - Kentucky bluegrass, cheatgrass and noxious weeds are all identified as serious threats to native plant species and muliple use management throughout the RMP Digest and are also factors in determining proper functioning condition of riparian and upland habitats. We would suggest the RMP develop plans to eradicate these species and make eradication a high priority.
  - Riparian areas and wetlands including alkaline and moist meadows
    - Paragraph 3: Dandelion is discussed as an exotic species. Dandelion is also an important food source for sage grouse chicks during the first several weeks after hatching.
  - Paragraph 5: Private irrigation diversion does affect the hydrologic regime compared to pre-settlement conditions, but the RMP Digest offers no explanation as to why one hydrologic regime is more or less "natural" than another since man is a natural part of the ecosystem. Beaverhead County Water Case #3808 discusses these historic changes for the Big Sheep Creek Basin.
- 3.1.10 Special Status Species – Wildlife
  - Affected Environment
    - Paragraph 5: The response the Counties have received from the USFWS is that the conservation strategies are "suggestions" and not mandates or requirements.
  - Bald Eagle
    - Paragraph 2: A citation would help clarify if this is a discussion of the BLM Dillon Field Office river bottom lands or a general discussion including other jurisdictions and private lands.
  - Trumpeter Swan

        - Paragraph 1: It is not clear to the reader if the threat to wetlands from irrigation and grazing are immediate and present, or if they are more of a long term and/or theoretical in nature.
    - Northern Bog Lemming
        - Paragraph 1: Does the last sentence mean there are no known occurrences of northern bog lemming on BLM Dillon Field Office lands?
    - Columbian Sharp-tailed Grouse
        - Are Columbian sharp-tailed grouse an indigenous species or an introduced exotic like Yellowstone Cutthroat Trout or Kentucky bluegrass that are displacing indigenous species
    - Swainson's Hawk
        - Swainson's hawk migrating to South America highlights the importance of considering cumulative impacts outside the BLM Dillon Field Office Planning area.
- 3.1.11 Vegetation – Forest and Woodlands
- 3.1.12 Vegetation – Rangelands
- 3.1.13 Vegetation – Riparian and Wetlands
    - We see functioning as a measure of how well a site is gathering and holding precipitation, protecting soil and site stability, and growing plants (based on expected capability for a land unit to support a natural range of potential plant communities). To select a "time" in history and predict what may or may not have in reality been present by modeling is unsatisfactory with regard to vegetation management. Many issues seem to be traceable to not perceiving management of a landscape as a dynamic process, but rather a fixed target.
    - The SIMPPLLE model brings some very good things the RMP process. The No Action alternative now has consequences and there is something besides the specialists' opinion on which to base the analysis.
    - The obvious flaw is with the circular logic that SIMPPLLE relies on. SIMPPLLE is correct because the specialists program it-and then- SIMPPLLE confirms the specialists are correct.
    - SIMPPLLE should demonstrate that the alternatives will maintain public land resources within the natural range of the Desired Future Condition and that it will be effective in reaching that Desired Future Condition.
    - Ideally, the BLM Dillon Field Office would make use of the knowledgebase of monitoring data from the past several decades and use SIMPPLLE to supplement any gaps in the monitoring data.
    - To essentially discard decades of in-the-field research, record keeping, and monitoring and replace it with remote sensing and computer simulations creates several problems. The defensibility of both the Resource Management Plan and any other planning processes become more difficult. How and where SIMPPLLE was used in development of the Resource Management Plan might simply be an appendix in the Draft Environmental Impact Statement.
- 3.1.11 Vegetation – Forest and Woodlands
        - Figure 2: We would suggest the graphic include a comparison to historic as was done in the USGS report, Altered Fire Regimes Within Fire Adapted Ecosystems

    - Forest Health
        - Paragraph 5: The discussion on whitebark pine declines highlights the need for maintenance of the widest range of structure and complexity in all habitat types.
        - We would encourage the BLM Dillon Field Office to identify in the Draft Environmental Impact Statement areas where Stewardship Contracts can take place for the health of the land and the mutual benefit of the BLM, the public and the Counties

- 3.1.12 Vegetation – Rangelands
  - Upland Vegetation
    - Paragraph 1: While the paragraph discusses the influences of livestock grazing, we suggest that a more comprehensive discussion of activities that have an influence on current conditions of rangelands would include the following:
      - Millenniums of pre-settlement ungulate grazing
      - Lightning caused fire regimes
      - Pre-settlement anthropogenic fire regimes
      - Post-settlement anthropogenic fire regimes
      - (Recent) Season of use, duration of use, frequency of use, intensity of use and class or species of domestic ungulate grazing.
      - (Recent) Season of use, duration of use, frequency of use, intensity of use and class or species of wild ungulate grazing.
      - Other recent use by users of public lands.
    - Paragraph 2: We would suggest the following for the last sentence - Additionally, the Beaverhead Mountains Section has received more sampling inventory than anywhere else in the state, which can add to the *apparent* diversity.
  - Noxious Weeds
    - Because noxious weeds have been identified as "a significant threat to multiple use management", "are considered the single most serious threat to natural habitats" and the federal, state and local government laws mandating noxious weed control, we would suggest that along with a comprehensive biological monitoring program, noxious weeds are the top management priority in applied management actions. Montana's Noxious Weed law may be found at MCA 7-22-2116.
- 3.1.13 Vegetation – Riparian and Wetlands
  - Riparian Habitat
    - Paragraph 1: Towards the end of this paragraph, there is a discussion of consumptive and non-consumptive uses. For the reader, this discussion raises more questions than it answers.
      - Are recreationists consumers of recreation? If they are not, does this mean there is no need of a limit to any recreational activity, as the supply is never consumed?
      - Do recreationists consume solitude of other recreationists and/or wildlife? If not, does this mean there are no concerns about recreationists, sage grouse leks, trumpeter swans and big game security?
    - Paragraph 2: At the end of this paragraph, we would suggest adding the following as the last sentence – DISCLOSURE: In certain limited instances, the BLM Dillon Field Office has removed beaver dams after specific analysis.
  - Function and Condition
    - Paragraph 1: We note that the Standards for Rangeland Health apply to all uses and users, not just livestock grazing. The Counties are concerned that all activities that are not monitored, everything but livestock grazing, may be in jeopardy, as neither the users nor the BLM Dillon Field Office can demonstrate their compliance with the Standards for Rangeland Health. Alternatively, the non-compliance of these other unmonitored uses could jeopardize livestock grazing.
    - We note that BLM TR 1737:11 allows for the ID Team to determine DFC and that DFC does not have to be PNC.
    - Paragraph 5: It is unclear if all 914 miles of riparian habitat have been evaluated for Proper Functioning Condition (PFC), or of the streams sampled, 18% are at PFC and the results were extrapolated across the field office. The text notes these are

"estimates of functional conditions", but other parts of the text infer intensive, onsite inventories of 914 miles of riparian areas.
        - The last sentence, "Many functional-at-risk (FAR) riparian areas are still within site potential but are being sustained in disturbance-caused, disclimax vegetation communities that may take decades to convert" is unclear to the reader. How are the "disclimax vegetation communities" different from the "earlier successional stage" discussed in BLM TR 1737-11? Will these communities "take decades to convert" because they are being maintained at an "earlier successional stage" because the climate in the planning area tends toward cold and dry, or some other undisclosed reason?
        - Paragraph 7: There is a discussion of the draw down of the Ruby and Lima Reservoirs. As these are reservoirs constructed for the purpose of draw down, is it legitimate to expect them to provide stable wetland habitats?
        - If stable wetlands in these reservoirs are important in these areas, we would suggest the BLM Dillon Field Office construct small, contoured, terrace like dams to hold water as the reservoirs are drawn down. Coordination and collaboration with the other agencies and users/managers of these facilities would be required for the Dillon Field Office to implement these changes.
    - Riparian Monitoring
        - Paragraph 2: This paragraph notes that "most transects have been duplicated at least twice, some several times". Is this level of biological monitoring adequate to determine condition and trend and differentiate between the impacts of other uses and the climate?
    - Influences on Riparian Habitat
    - Paragraph 1: While the paragraph discusses the influences of livestock grazing, we suggest that a more comprehensive discussion of activities that have an influence on current conditions of riparian areas would include the following:
        - Millenniums of pre-settlement ungulate grazing
        - Lightning caused fire regimes
        - Pre-settlement anthropogenic fire regimes
        - Post-settlement anthropogenic fire regimes
        - (Recent) Season of use, duration of use, frequency of use, intensity of use and class or species of domestic ungulate grazing.
        - (Recent) Season of use, duration of use, frequency of use, intensity of use and class or species of wild ungulate grazing.
        - Freezing and thawing of streambanks
        - Effects of ice and ice breakup on streambanks and streambank vegetation.
        - Other recent use by users of public lands.
- 3.1.15 Water
        - We would suggest changing the section heading to something like "Water – Quality and Yield".
    - Surface Water
    - We would suggest including a discussion in this section on how "overcrowded woodland and forest conditions could be contributing to less water yields".
- 3.1.17 Wildlife
        - We would suggest changing this section heading to something like "Wildlife Habitat".
    - Affected Environment
        - Paragraph 1: Ecosystem management is a daunting task as each of the 175 species of migratory birds, 22 species of waterfowl, 21 species of raptors and an undisclosed number of small mammals, reptiles, amphibians and insects must all receive equal

consideration in alternative development, development of desired future conditions, impact analysis and eventual implementation of the RMP as do game species such as elk.

- Wildlife Species Occurrence
  - We would suggest that this section heading and everything following it be moved to the 3.2 Resource Uses section and titled "Wildlife Forage and Cover".
  - Additionally, we would expect that wildlife grazing and browsing would be a management concern and discussed under this section. At a minimum we hope this section would discuss:
    - Seasons of use
    - Duration of use
    - Frequency of use
    - Intensity of use
    - Species and class of wildlife
  - It would also be preferable to include a discussion of impacts and mitigation, or lack thereof on issues including:
    - Year long grazing/browsing
    - Season long non-rotational grazing/browsing
    - Grazing/browsing while stream banks are saturated
    - Grazing/browsing prior to flowering
    - Grazing/browsing prior to seed set/seed shatter
    - Grazing/browsing impacts on vegetative reproduction of plant species or unique plant communities e.g. aspen stands, mountain mahogany
  - Table 17: Ideally this table would provide comparable information by species to the information provided in Appendix D to allow benchmark analysis.
  - We are concerned there is inconsistency in the information provided in that it does not allow for Benchmark Analysis to be used to describe maximum and minimums amount of resource production. Specifically there seems to be a discrepancy between how outputs are measured for two very similar uses of public land resources. Livestock Grazing is quantified as AUMs (Animal Unit Months), however Wildlife habitat is measured in acres in Table 17. This is neither a measure of productivity nor use levels. Since the BLM Dillon Field Office manages the resource and does not manage animals or wildlife per se, benchmarks that address resource related minimums and maximums are more appropriate.
  - We suggest that any and/or all uses of the public land resource be acknowledged as uses and that a minimum and maximum output for Wildlife forage and cover be a quantifiable measure of rangeland and forest productivity. Although not the only users of Wildlife forage and cover, elk are large herbivores. An output benchmark in AUMs is appropriate for the forage resource they consume along with a discussion of season of use, duration, intensity, timing, frequency, and any mitigation measures. If elk also have timber requirements (such as optimal quantities for security and/or thermal cover) then that use needs to be recognized and quantified with benchmark analysis.
  - Conversely, if quantifying acres of habitat are more beneficial to management of the resource, we believe that the Livestock Grazing should be measured in acres of grazing allotments.
- Furbearers
  - Paragraph 2: We would suggest adding the following at the end of this paragraph: DISCLOSURE: In certain limited instances, the BLM Dillon Field Office has removed beaver dams after site-specific analysis.

- 3.2.2 Lands and Realty
    - Unauthorized Use
        - The BLM Dillon Field Office employs a Law Enforcement Officer (LEO) to improve enforcement on public lands. At times the DFO's LEO has been reassigned to "higher" priorities and have resulted in less enforcement on public lands or the Counties picking up the slack.. We would suggest that contracting with the Sheriff's Offices of Madison and Beaverhead Counties would improve response times, and better ensure year around enforcement.
- 3.2.3 Livestock Grazing
    - Standards for Rangeland Health and Grazing Management Guidelines
        - Paragraph 2: Rangeland Health standards apply to all users and uses, but none of the other resource use sections discuss compliance with Rangeland Health standards. The Counties are concerned that everything but livestock grazing, may be in jeopardy, as neither the users nor the BLM Dillon Field Office can demonstrate their compliance with the Standards for Rangeland Health.
        - Paragraph 4: We have some concerns that the biological monitoring is of insufficient resolution to differentiate between the impacts of all uses of public land resources. Wildlife ungulate impacts may be misattributed to livestock grazing.
- 3.3 Fire Ecology
    - Historical Fire Regimes
        - We would suggest using the "effective disturbance cycle" methodology used by Barrett in "Historical Fire Regimes on the Beaverhead-Deerlodge National Forest, Montana – Beaverhead Portion", instead of evaluation by fire cycles missed. This more effectively describes the cumulative impacts of current management and the resulting deviation from historic conditions.
- 3.4.5 Wild and Scenic Rivers
        - We include with this reference the Wild and Scenic River comments previously submitted by Beaverhead County.
- 3.4.6 Wilderness
    - Affected Environment
        - Paragraph 2: This paragraph suggests to the reader that there is, or will soon be a need to ration use of designated wilderness areas in the RMP as consumption of wilderness values may exceed supply.
- 3.51 Economic Conditions
    - It would be preferable to condense this section. The Counties consider all industries to be important and significant. We contend that if commodity producers are forced to find alternatives to their traditional income stream because of more restrictive regulatory policy by the BLM, then the BLM is part of the cause and that an increase in resource degradation due to higher recreational travel is an effect.
    - We would also suggest a discussion of how the basic industries have been changing from commodity production towards more diversified and value added entities:
        - Agriculture – Shifting from commodity (cattle, grains) to production of purebred and exotic animals, seed potatoes and value added crops like riding horses. Many agricultural operations also incorporate some level of paid recreational use.
        - Mining – Shift from gold, silver, copper to value added products like talc and ruby abrasives.
        - Forest Products – Changing from commodities like saw logs and studs to higher value products like house logs or value added products like decorative fencing, paneling and flooring.

        - Recreation – Has changed from providing the commodity of access and opportunity to value added products of high quality experiences.
    - Mixing cash revenues and willingness-to-pay utility values in an economic analysis is like comparing apples and silly putty. For example, the BLM Dillon Field Office hires a contractor to complete the economic analysis of the RMP alternatives for a fee of $100,000. However, the contractor will not complete the economic assessment simply because the Dillon Field Office is willing-to-pay $100,000, the contractor will still require payment in full of the $100,000 cash for the work. This is because the economic assessment contractor understands that willingness-to-pay values are a theoretical abstraction and are not a substitute for, or comparable to cash revenues. If both cash revenues and willingness-to-pay (utility) values are to be used in the economic analysis, both the analyses need to be kept separate because they are not comparable.
    - The Economics section and appendices also highlight the change from authorized/permitted use to casual/recreational uses. It occurs to the Counties that the shift in use from permitted to casual use correlates strongly with the difficulties in resource management and funding issues identified by the BLM Dillon Field Office. This change also concerns the Counties as revenue sharing acted as a kind of mitigation for the impacts of agencies on local governments.
- 3.5.2 Environmental Justice
    - Affected Environment
        - The Environmental Justice section does no seem consistent with a plain reading of EPA's Final Guidance for Incorporating Environmental Justice Concerns, BLM IM 2002-164, 42 USC 1983 or the 14th Amendment.
- 3.5.8 Social Conditions
    - Affected Groups
        - ***We suggest an alternative way of considering affected groups and have included this information at Tab #11***. Alternatively we would suggest including the Low Income and Local Government sections of Tab ## in this section of the Resource Management Plan.
        - As examples of the impacts of agency actions on local governments, we would suggest the following:
            - Designation of the Big Sheep Creek Back Country Byway. Designation has increased the County's costs and obligations to adequately maintain the roadway along with additional law enforcement, ambulance and search and rescue.
            - The recent Rainbow Family Gathering near Jackson and earlier Earth First! Round River Rendezvous near Ennis also created extreme demands for services on local communities and governments.